The Honorable Michael Regan, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Administrator Regan:

The U.S. Environmental Protection Agency’s (“EPA”) ENERGY STAR program is one of the most publicly recognizable and impactful voluntary programs available to both save homeowners money on their energy bills and help this Administration to meet its ambitious climate decarbonization goals. Its “Certified Homes” program, if properly configured, can drive immediate and substantial carbon reductions from the residential building sector. Unfortunately, the EPA appears to be considering a Version 3.2 ENERGY STAR Certified Homes update (“Version 3.2”) that falls far short of meeting the climate challenge.

Version 3.2 is intended to be at least ten percent more stringent than the 2021 International Energy Conservation Code (“2021 IECC”). However, some industry stakeholders advocate that EPA weaken the mandatory building envelope requirements included in the October 2021 proposal. If those requirements are dropped, Version 3.2 may not ensure the substantial lifetime building envelope efficiency improvements that are the hallmark of the 2021 IECC as compared to previous code editions. Instead, Version 3.2 may permit minimum insulation standards at the significantly lower level established in the 2012 IECC and maintained in the 2015 and 2018 IECC.

To maximize energy bill savings over the longer term and to be fully aligned with the Administration’s climate goals, the Version 3.2 update must set the prescriptive building envelope levels of the 2021 IECC as a minimum requirement for this voluntary program. A highly efficient building envelope delivers many important benefits. It reduces home energy consumption and carbon emissions for decades with measures such as wall insulation that are very hard to retrofit after construction. In addition, it moderates a home’s energy usage during intensive heating and cooling periods, promoting resiliency and reducing peak electricity demand, including winter peaks in electric heating, which are hard to meet with renewable power.

Aligning ENERGY STAR Version 3.2 with the mandatory requirements of the 2021 IECC is also cost effective. The Department of Energy analyzed the 2021 IECC, stating: “the prescriptive and mandatory provisions of the 2021 IECC are shown to generate an average life-cycle cost savings of $2,320, an average payback of 10.5 years, and the years to cumulative positive cashflow averaging 4 years for all climate zones.” (National Cost Effectiveness of the Residential Provisions of the 2021 IECC, Pacific Northwest National Labs – June 2021)

VIA E-MAIL

February 11, 2022
Finally, weakening the backstop for a voluntary program would send the wrong signal at a time when states and local jurisdictions are considering whether to adopt the 2021 IECC to achieve its large energy and carbon savings.

In closing, we ask that EPA fully meet the challenge demanded by the climate crisis and issue an ENERGY STAR Version 3.2 standard that sets minimum mandatory envelope standards consistent with the 2021 IECC.

Sincerely,

Alliance to Save Energy
American Council for an Energy-Efficient Economy
Energy Efficient Code Coalition
Institute for Market Transformation
Insulation Contractors Association of America
National Association of State Energy Officials
Natural Resources Defense Council
New Building Institute
North American Insulation Manufacturers Association
Polyisocyanurate Insulation Manufacturers Association
Responsible Energy Code Alliance
U.S. Green Building Council

cc: Victoria Arroyo, Associate Administrator, Office of Policy
    Joseph Goffman, Principal Deputy Assistant Administrator, Office of Air and Radiation
    Chris Grundler, Director, Office of Atmospheric Programs
    Elizabeth Shaw, Deputy Assistant Administrator, Office of Air and Radiation