



ENERGY STAR SFNH Version 3.2 and MFNC Version 1.2 – Draft 2 Stakeholder Comment Form

Please submit written comments to energystarhomes@energystar.gov no later than April 15, 2022, using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

Organization Name: National Association of State Energy Officials (NASEO)

Respondent Last Name: [Add last name]

Respondent First Name: [Add first name]

Comments:

1) [Do you have feedback on the revised thermal backstop contained in Draft 2?](#)

Thank you for the opportunity to provide additional comments on the proposed ENERGY STAR SFNH Version 3.2 program. The National Association of State Energy Officials and our 56 State and Territory Members have supported the ENERGY STAR program since its creation. We strongly support continued program innovation to ensure that the voluntary ENERGY STAR recognition programs, including the ENERGY STAR SFNH and MFNC, assist Americans with identifying the most energy efficient products on the market in order maximize their energy cost savings.

NASEO supports the revised thermal backstop using the 2021 IECC as proposed by U.S. EPA in draft 2. The voluntary, above code ENERGY STAR New Homes program recognizes the highest performing homes. Use of the newest building energy code edition, the 2021 IECC, best supports the program goals, especially as U.S. EPA has indicated that it believes this standard will be in place for some time. The new thermal backstop will only impact states where the 2021 IECC has been adopted, and the phase-in period for builders allows time for adoption. This voluntary, above code program may be used as the basis for state, federal, and local tax credits in the future, and should rely on high energy efficiency in return for recognition of the property and potential tax benefits for the builder.

The 2021 IECC was determined by the Pacific Northwest National Laboratory and U.S. Department of Energy to be cost effective. Many State Energy Offices were involved in the development of the 2021 IECC and use building energy codes as a tool to achieve the energy efficiency, resilience, and energy affordability goals of their states. Use of older building energy codes for the baseline would be inappropriate for the voluntary ENERGY STAR SFNH v3.2 in states that have adopted the 2021 IECC.

2) [Do you have additional general feedback on the changes proposed in Draft 2?](#)

[Add comments]