

Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source   | Date Posted | Commenter  | General Comments   | Scope   | Positive/Constructive Comments  | Negative Comments   | Votes         |        |             |            |                        |              |                            |                               |                           |
|----|----------|-------------|------------|--|---|---|---|---------------|--------|-------------|------------|------------------------|--------------|----------------------------|-------------------------------|---------------------------|
|    |          |             |            |  |   |   |   | Blog Choices  |        |             |            | Public Comment Options |              |                            | Other Options Noted in Public |                           |
|    |          |             |            |  |   |   |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel | DOE's HEST                    | Also include Cost by Fuel |
| 1  | Facebook | 8/13/2013   | Facebook   | 44 likes   |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 2  | Facebook | 8/13/2013   | Individual | MPG stats are corrupt  |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 3  | Facebook | 8/13/2013   | Individual |  | Apartments should also be rated   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 4  | Facebook | 8/13/2013   | Individual |  |   | Makes a lot of sense  |   |               |        |             |            |                        |              |                            |                               |                           |
| 5  | Facebook | 8/13/2013   | Individual | Home EE needs more focus   |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 6  | Facebook | 8/13/2013   | Individual | Rate energy companies  |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 7  | Facebook | 8/13/2013   | Individual | It will be complicated   |   |   | A great start   |               |        |             |            |                        |              |                            |                               |                           |
| 8  | Facebook | 8/14/2013   | Individual |  |   | Will help people; likes the idea.   |   |               |        |             |            |                        |              |                            |                               |                           |
| 9  | EVT Blog | 8/12/2013   | Contractor | Try DOE's HEST to standardize things   |   |   | Don't create a new label; too many confuse consumers and markets                  |               |        | 1           |            |                        |              |                            |                               |                           |
| 10 | EVT Blog | 8/12/2013   | Individual | Allow comparisons of different sized buildings   |   |   |   |               | 1      |             |            |                        |              |                            |                               |                           |
| 11 | EVT Blog | 8/13/2013   | Contractor | We need better utility bill access and mandatory disclosure  |   |   | We don't need more labels; there are already too many                             |               |        |             |            |                        |              |                            |                               |                           |
| 12 | EVT Blog | 8/13/2013   | Individual | Supports national standardized score   |   | Likes DOE HEST  |   |               |        | 1           | 1          | 1                      |              |                            |                               |                           |
| 13 | EVT Blog | 8/13/2013   | Individual | Keep it simple and standard  |   |   |   |               |        |             | 1          | 1                      |              |                            |                               |                           |
| 14 | EVT Blog | 8/14/2013   | Individual | Don't create a new system; create a "Home or Appliance MPG"  |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 15 | EVT Blog | 8/14/2013   | Individual | Keep it simple   |   |   |   |               | 1      |             |            |                        |              |                            |                               |                           |
| 16 | EVT Blog | 8/15/2013   | Utility    | Disclosing delivered fuels will be challenging   |   |   |   |               |        |             |            |                        |              |                            |                               |                           |
| 17 | EVT Blog | 8/16/2013   | Individual | Dollar amounts are something everyone understands and cares about.   |   | Consider combining \$ with #1 and #2 to show how you compare to others and how much room there is to improve.   | DOE's HEST is too simple and doesn't provide enough context.                      | 1             | 1      |             |            |                        |              |                            |                               |                           |
| 18 | EVT Blog | 8/21/2013   | Utility    | Option 2 is only useful to non-civilians. Option 3 exists and so is attractive   |   | Labels should refer to a "typical house"  | Option 4 is not worth mentioning since homeowners should already know this anyhow | 1             |        | 1           |            |                        |              |                            |                               |                           |
| 19 | EVT Blog | 8/23/2013   | Contractor | Use a label that already exists. Labeling is a good thing.   | Start with electricity and natural gas before expanding to other fuels. | Use actual energy bills, not models, for more accuracy; start with electricity and natural gas.   | Don't provide upgrade costs unless it is the real price.                          |               |        | 1           |            |                        |              |                            |                               |                           |
| 20 | EVT Blog | 8/27/2013   | Utility    | #4 is down to earth and spartan, relying less on flashy or iconic symbolism.   |   | Likes objective over comparative.   | Options 1 and 2 are too busy and unwieldy.  |               |        |             | 1          |                        |              |                            |                               |                           |
| 21 | EVT Blog | 8/31/2013   | Individual | Use measured consumption over modeling. Would allow wider use than just small group of modeling experts. HERS could be used to avoid creating a new model.   |   | Using actual energy usage vs. modeled can reward/punish behavior.   |   |               |        |             |            |                        |              |                            |                               |                           |
| 22 | EVT Blog | 8/31/2013   | Individual | Labels help people think in terms of useful energy output rather than cost per gallon of fuel.   |   |   |   |               |        | 1           |            |                        |              |                            |                               |                           |
| 23 | EVT Blog | 8/31/2013   | Individual | Option 4 should be a secondary part of the other three ratings.  |   | Only show dollar amounts in terms of improving the home's efficiency relative to the initial cost. Make sure showing cost doesn't drive fuel switching as much as EE. |   |               |        | 1           | 1          |                        |              |                            |                               |                           |
| 24 | EVT Blog | 8/31/2013   | Individual | Combine the graph from option 1 with the cost per square foot of option 2 and include the cost per fuel source in dollars as outlined in option 4, it would be a helpful tool for home buyers and homeowners |   |   |   | 1             | 1      |             | 1          |                        |              |                            |                               |                           |
| 25 | EVT Blog | 8/31/2013   | Individual | Confusion because higher ratings are usually better, not worse.  |   | We all understand that saving money motivates us all.   |   |               |        |             |            | 1                      |              |                            |                               |                           |

Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source   | Date Posted | Commenter  | General Comments   | Scope | Positive/Constructive Comments   | Negative Comments   | Votes         |        |             |            |                        |              |                            |                               |                           |
|----|----------|-------------|------------|--|-------|--|---|---------------|--------|-------------|------------|------------------------|--------------|----------------------------|-------------------------------|---------------------------|
|    |          |             |            |  |       |  |   | Blog Choices  |        |             |            | Public Comment Options |              |                            | Other Options Noted in Public |                           |
|    |          |             |            |  |       |  |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel | DOE's HEST                    | Also include Cost by Fuel |
| 26 | EVT Blog | 8/31/2013   | Individual | Homeowners should know how much energy their home uses, so no need to label that.  |       | Option 4: Tying a rating directly to actual costs provides the most information for consumers.   | Option 1 is too esoteric, not tied to real-world experience.<br>Option 2: Like labeling car with consumption per pound; not very useful info by itself.<br>Option 3: Inverse relation between score and energy consumption is a problem.  |               |        |             | 1          |                        |              |                            |                               |                           |
| 27 | EVT Blog | 8/31/2013   | Individual | Option one has the most instantly readable graphic. This is good. Reminds me of Tufte's wonderful books: Visual Explanations and Envisioning Information.  |       | Reverse the growth direction by measuring increasing efficiency (versus a diminishment of energy).<br>Add a touch one more color.  | Option four I found confusing, not knowing whether the house HAS each of those fuels, or would cost that much of each fuel if that were its exclusive fuel.   | 1             |        |             |            |                        |              |                            |                               |                           |
| 28 | EVT Blog | 8/31/2013   | Individual | I like #3 visually because the higher rating, looking 'bigger and better' is less use.   |       |  |   |               |        | 1           |            |                        |              |                            |                               |                           |
| 29 | EVT Blog | 8/31/2013   | Individual | There are plenty of labels at the National level which show the same information   |       |  | This agency can do quite a bit without resorting to new rules and regulations. That's a huge waste of energy.   |               |        |             | 1          |                        |              |                            |                               |                           |
| 30 | EVT Blog | 8/31/2013   | Individual |  |       |  |   |               |        |             |            | 1                      |              |                            |                               |                           |
| 31 | EVT Blog | 8/31/2013   | Individual | What result do you want? If a sales tag then 1+4 with a \$ lifetime cost assuming past fuel cost trends. If to motivate improvement then how am I doing in relationship with others to shame one into action.                  |       | What about carbon footprint compared to the world average or some other targeted behavior (state's goal)?  |   | 1             |        |             | 1          |                        |              |                            |                               |                           |
| 32 | EVT Blog | 8/31/2013   | Individual | In general for all of these measures, I, as a shopper, don't compare the square footage for energy use but rather compare houses that have a similar number of bedrooms, and other room needed such as a full basement or den. |       | The wording of "least and most efficient" are much more specific than "more or higher use".<br>#4 It should show the total cost for energy for that specific house.  | #1 is vague because the eye goes to the color first and that is a faded change from pale blue to pale green. Then as one looks around for more info the numbers across the bottom finally catch the eye. Also the words, highest and lowest and estimate, are somewhat vague.<br>#3 The numbers only give me a score, then I have to search around for the meaning in the fine print. |               | 1      |             | 1          |                        |              |                            |                               |                           |
| 33 | EVT Blog | 9/2/2013    | Individual | the breakdown of costs is helpful; without it, the figures seem nebulous.  |       |  | Option 3: This one is confusing -- it presents a 'less is more' (or more is less) picture -- isn't instantly comprehensible.  |               |        | 1           | 1          |                        |              |                            |                               |                           |
| 34 | EVT Blog | 9/3/2013    | Individual | I like to see lower/smaller bars representing lower usage, sort of like thinking about my carbon footprint...I want it smaller.  |       | Ratings and education around energy efficient appliances is also valuable.   | If it ain't broke, don't fix it. Why not use the Home Energy Score now used in Vermont? (RF: I think she means HERS). Use the money and time to make it more cheaply available.   | 1             |        |             |            |                        |              |                            |                               |                           |
| 35 | EVT Blog | 9/3/2013    | Individual |  |       |  | If this label passes, the value of our home will probably drop by \$50,000. I doubt we will never be able to sell it. It could potentially ruin us financially.   |               |        |             |            |                        |              |                            |                               |                           |
| 36 | EVT Blog | 9/3/2013    | Consultant | Label buildings with 1) total \$/year operating costs, 2) DOE's HEST and 3) list upgrade programs  |       | Participation in any energy upgrade programs, such as Home Performance with ENERGY STAR, Weatherization Assistance Program, Vermont Gas Systems Program, or met a benchmark, such as "Achieved 25% Savings". |   |               |        |             | 1          | 1                      |              |                            |                               |                           |
| 37 | EVT Blog | 9/4/2013    | Contractor |  |       | Suggest to have option 3 with an adder of \$\$\$/yr. by itself (loose the bar graph)   |   |               |        |             | 1          | 1                      |              |                            |                               |                           |



Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter                    | General Comments   | Scope  | Positive/Constructive Comments   | Negative Comments   | Votes         |        |             |            |                        |              |                               |            |                           |
|----|--------------|-------------|------------------------------|--|--|--|---|---------------|--------|-------------|------------|------------------------|--------------|-------------------------------|------------|---------------------------|
|    |              |             |                              |  |  |  |   | Blog Choices  |        |             |            | Public Comment Options |              | Other Options Noted in Public |            |                           |
|    |              |             |                              |  |  |  |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel    | DOE's HEST | Also include Cost by Fuel |
| 43 | PSD Comments | 9/1/2013    | Town Energy Committee Member | My main concern is how the label will be used. I would urge caution on how the label is used, because of its potential negative effects on homeowners. Even if it is the intent of the program is to "light a fire" so to speak, under these people to incentivize the homeowners to do an upgrade, it won't work. So, the proposed labeling initiative may be well intentioned, and can accomplish a lot in providing a real-time picture of the energy status of all VT residences—with a number of consequent benefits. But, please be careful to do it in a way so as to not compromise the fragile financial integrity of over 200,000 VT homeowners! |  | I would like to go on record as saying that, as a member of the TEC, I'm in favor of all manner of incentives that encourage people to undertake energy efficiency and weatherization programs for reasons that are obvious.   | People will suffer the economic consequences of depressed housing prices, and won't be able to sell their homes, unless they're willing to take a substantial loss. Instead of acting as an incentive to upgrade and being informative, the program may, in fact, be punitive!!<br>The transparency gained by this proposed labeling will be a direct benefit to renters and home buyers, and a detriment to home owners (possibly over 200,000) whose home values will be downgraded by the proposed energy labeling options (particularly if disclosure is mandatory at time of sale) |               |        |             |            |                        |              |                               |            |                           |
| 44 | PSD Comments | 9/2/2013    | Contractor                   | Having such a rating system in common practice might be the missing key to motivating the majority of Vermonters to undertake substantial energy retrofits. Bravo!   | Developing a tool that landlords can use to assess their buildings could prove useful. | 1. Add "public recognition" as another use case.<br>2. Add climate change into the metrics.<br>3. BEE logo: include red fading to green.<br>4. Find simple metaphors that non-energy-geek people will relate to.<br>5. find simple metaphors that non-energy-geek people will relate to.<br>6. Name: VT Home Energy Score seems like a good name to me.<br>7. It seems important that the score incorporate the R.E. elements that a homeowner has built into their home. Perhaps a 4th metric could address the home's effect on climate change and incorporate renewables.<br>8. Balance adequate training with reasonable costs.<br>9. I do not think that a score/rating system going in the opposite direction to HERS is a deal breaker, other factors are much more important, like accuracy, cost, ease of use and understandability.<br>10. Appraisal Issues & HERS: More concerning to me than getting the VT energy score to jibe with HERS is getting it to effectively inform home appraisals.<br>11. I strongly urge the Home Energy Score |   |               |        |             |            |                        |              | 1                             |            |                           |
| 45 | PSD Comments | 9/3/2013    | Trade Association            | The devil is in the details  |  | 3. I guess I like BEE<br>6. Energy Auditors, Home Performance contractors, and HVAC contractors possibly working as a team at first until they all get cross trained. Yes, there should be minimum training requirements and qualifications. (In the interest of full disclosure, I would want to be one of the trainers.) A goal for this would be to train other interested professionals, (Realtors?) to eventually be able to do assessments as well.  | The big hang-up for the heating system is evaluating the efficiency of a pre AFUE system, and a condensing boiler with a non-condensing heating system, and how will you rate a heating boiler that also heats the water? So, I guess I am concerned with the training and qualifications of the "qualified assessor" referenced on page 5.   |               |        |             |            | 1                      | 1            |                               |            |                           |



Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter  | General Comments  | Scope | Positive/Constructive Comments  | Negative Comments   | Votes         |        |             |            |                        |              |                               |            |                           |
|----|--------------|-------------|------------|---|-------|---|---|---------------|--------|-------------|------------|------------------------|--------------|-------------------------------|------------|---------------------------|
|    |              |             |            |   |       |   |   | Blog Choices  |        |             |            | Public Comment Options |              | Other Options Noted in Public |            |                           |
|    |              |             |            |   |       |   |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel    | DOE's HEST | Also include Cost by Fuel |
| 50 | PSD Comments | 9/4/2013    | Builder    | I have some concerns about this Scoring methodology. I fear we are moving toward a policing state and also inviting litigious activity when we don't need to invite it.<br>We need to keep some sort of balance in this Act or the whole thing can tip over. I am not opposed to some sort of rating system for all new homes. For reasons already expressed, I fear that older homes will lose their value not just for its owner but also to the banks who finance them. I feel good intentions and fear for unintended consequences. |       | Any statement of usage must carry with it an allowance for human preference and behavior.<br>I like the HERS rating. Any projection of MMBtus/year will change with the age of the structure. It's a invitation for a litigious disaster for homeowners, builders and landlords. Good for lawyers and certified home assessors.<br>Builders should still be allowed to self-certify by providing real data.   | Our company, Prudent Living Inc. and Biebel Builder's Inc., just became comfortable with 2011 RBES formulas. Are we recreating a new wheel ...again? More seminars...again? More training and more conferences? More certifications? More requests from lawyers and realtors at closings? Who pays for all this?<br>Every year it seems like another pile of compliance requirements are added to the sale of a home before it can be sold.<br>I fear that any new metric will someday be used as a taxable opportunity so I am against it for that reason, mostly. |               |        |             |            |                        |              |                               |            |                           |
| 51 | PSD Comments | 9/4/2013    | Utility    | Failing to include the transportation energy use, which is by far the largest energy use of a building, will lead to us encouraging people to buy/rent homes that are "Energy Efficient" - read electric and thermal efficient that will cost the owner/renter far more to live in than a location efficient home.  |       | We could use:<br><a href="http://htaindex.cnt.org/">http://htaindex.cnt.org/</a><br><a href="http://www.walkscore.com/">http://www.walkscore.com/</a><br><a href="http://abogo.cnt.org/">http://abogo.cnt.org/</a><br><a href="http://www.epa.gov/smartgrowth/pdf/location_efficiency_BTU.pdf">http://www.epa.gov/smartgrowth/pdf/location_efficiency_BTU.pdf</a>   |   |               |        |             |            |                        |              |                               |            |                           |
| 52 | PSD Comments | 9/4/2013    | Consultant | There may be too much emphasis on "asset-based" (standard operating conditions), especially for heating fuel in a cold climate. I will note that extensive analysis by Michael Blasnik indicates that even across changes in occupancy, the previous occupant's energy bills are generally a better predictor of future energy use than a model is.   |       | Separate from the merits of a purely "Asset" based system, I'd strongly suggest considering using a source, rather than site energy for the MMBtu scale. The DOE home energy score is based on source energy, there is precedent for it in current and recent versions of the IECC code (in the performance path) and there are several advantages to using source energy.<br>I would strongly suggest however requiring at least that any asset-based rating for heating fuel be accompanied by an analysis of previous (or current) occupant's heating fuel use, and that the asset rating be constrained by that historical record.<br>MMBtu/year is good.<br>make it an "energy use per bedroom" value- that way, homes with more "capacity" (bedrooms) can be compared to similar homes, without making large homes look more efficient than small homes.<br>Building Energy Score or Building Energy Scale "scale" might tie more naturally to the "lower is better" metric, since people are used to "scales" to measure weight. | I think adding the DOE HES would add confusion, I don't think it's necessary.   |               |        |             |            | 1                      |              |                               |            |                           |

Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter         | General Comments   | Scope  | Positive/Constructive Comments   | Negative Comments  | Votes         |        |             |            |                        |              |                            |                               |                           |
|----|--------------|-------------|-------------------|--|--|--|--|---------------|--------|-------------|------------|------------------------|--------------|----------------------------|-------------------------------|---------------------------|
|    |              |             |                   |  |  |  |  | Blog Choices  |        |             |            | Public Comment Options |              |                            | Other Options Noted in Public |                           |
|    |              |             |                   |  |  |  |  | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel | DOE's HEST                    | Also include Cost by Fuel |
| 53 | PSD Comments | 9/4/2013    | Trade Association | REV would like to commend the thoughtfulness that has clearly gone into this proposal – from the selection criteria regarding an asset-based estimate as opposed to previous usage, and also regarding the graphic displays. |  | It is suggested not to use the term “your” for a number of reasons. First, if the time during which the labels will be used is at point-of-sale, it is more appropriate to call the building “this building”, since the term “yours” may not be accurate. Second, this removes some of the potential for placing building owners on the defensive by distancing the owner from the building. A title along the lines of “This Building’s Energy Use per Year” for “Building Energy Estimate”; and “This Building’s Energy Use Compared to Similarly Sized Buildings” is, although more lengthy in words and not eloquent, clearer. update the MLS so it incorporates for this new label<br>Both on and off-site renewable energy production needs to be counted within the energy rating<br>Energy production for PV should be based on a readily available downloadable model such as PV Watts.<br>if a homeowner is involved in a group net-metered system, and<br>if that ownership is going to remain with the home (as opposed to the | Perhaps Watts would be more appropriate.<br>The language in the label needs to be reviewed again as to whether they are focusing on efficiency, or whole building energy consumption and use – or, carbon neutrality.  |               |        |             |            |                        |              |                            |                               |                           |
| 54 | PSD Comments | 9/4/2013    | State Agency      | VTrans would like to work with you and the others involved in the scoring system to develop a simple locational efficiency score for Vermont.  |  | A simple scoring system based on proximity to identified growth centers or bonus points for homes located in places where there are transit service and/or high walk scores are possible approaches to pursue.   |  |               |        |             |            |                        |              |                            |                               |                           |
| 55 | PSD Comments | 9/4/2013    | Utility           | this score should be interpreted as a tool that initiates further dialogue and future engagement of a BPI professional   | Building energy score estimate should apply to single family detached homes and upon further refinement and discussion potentially apply to multi-family homes of a particular size and configuration. |  | More quantitative data (as listed in Options 2 and 3) without additional explanation by the person performing the score may create customer confusion and drive them away from the process altogether. We continue to support the use of the Operational rating; While we believe an operational based rating is preferable, using an asset based system for the building energy scoring is a reasonable approach. |               |        |             |            | 1                      |              |                            |                               |                           |

Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter         | General Comments   | Scope | Positive/Constructive Comments  | Negative Comments   | Votes         |        |             |            |                        |              |                               |            |                           |  |
|----|--------------|-------------|-------------------|--|-------|---|---|---------------|--------|-------------|------------|------------------------|--------------|-------------------------------|------------|---------------------------|--|
|    |              |             |                   |  |       |   |   | Blog Choices  |        |             |            | Public Comment Options |              | Other Options Noted in Public |            |                           |  |
|    |              |             |                   |  |       |   |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel    | DOE's HEST | Also include Cost by Fuel |  |
| 56 | PSD Comments | 9/4/2013    | Consultant        | Customer testing is key.   |       | The third label showing dollars is, I think, what many customers will be most interested in, regardless of their level of awareness or interest in energy efficiency. Everyone understands dollars. Name: Building Energy Use Estimate or something similar--keep it simple. Maybe for homes that have a HERS rating you could include the Building Energy Estimate information along with the HERS Index. I think the buyer/renter would find the energy use net of on-site renewable energy production most useful because it would relate directly to annual costs. However, the seller may want both total building energy and building energy net of renewable energy production shown to show the impact of the renewable energy options on annual cost. As many people as possible should be able to deliver the energy label. However, there should be clear training or qualification requirements for ANYONE certified to deliver the label. I think the commercial building sector may be interested in more detail, so offering something similar to version 3 would be | I doubt most customers are aware of the DOE Home Energy Score. Therefore I think it is fine to NOT reference the DOE Home Energy Score. |               |        |             |            |                        |              | 1                             | 1          |                           |  |
| 57 | PSD Comments | 9/4/2013    | Trade Association | I am for any form of the label that you end up deciding upon. I like the version with more information on it.  |       | Any move towards having a label that gives good information on new and existing homes is a step forward.  |   |               |        |             |            |                        |              |                               | 1          |                           |  |
| 58 | PSD Comments | 9/4/2013    | Software Vendor   | We recommend that the state of Vermont follow and participate in emerging national trends that provide flexibility in the tools contractors use to collect field data. |       | We encourage all parties to collaborate with the Department of Energy to foster a national standard that can potentially create broad market transformation. Vermont has an opportunity to lead by helping the Department of Energy improve its score and to drive adoption in the Northeast. We suggest utilizing the industry standard for data collection, HPXML.  |   |               |        | 1           |            |                        |              |                               |            |                           |  |



Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter             | General Comments  | Scope   | Positive/Constructive Comments  | Negative Comments   | Votes         |        |             |            |                        |              |                            |                               |                           |  |
|----|--------------|-------------|-----------------------|---|---|---|---|---------------|--------|-------------|------------|------------------------|--------------|----------------------------|-------------------------------|---------------------------|--|
|    |              |             |                       |   |   |   |   | Blog Choices  |        |             |            | Public Comment Options |              |                            | Other Options Noted in Public |                           |  |
|    |              |             |                       |   |   |   |   | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel | DOE's HEST                    | Also include Cost by Fuel |  |
| 61 | PSD Comments | 9/4/2013    | Contractor            | I really like option 3 because it is simple and can integrate to lenders more easily.   |   | I would add the dollar amount only based on KWh and fossil fuel in option 3 (but loose the bar graph) and have a note that using wood would lower heating cost and in small print put the cost for fully heating with wood.   |   |               |        |             |            |                        |              | 1                          |                               |                           |  |
| 62 | PSD Comments | 9/4/2013    | Advocacy Organization | Without including the transportation costs that come along with "using" and owning a particular house, the "energy performance of the building" is not being fully described.   | Consider the very important issue of transportation energy use.   |   | it is disappointing to see that the proposed home energy scores and labels left out a major energy user: transportation.  |               |        |             |            |                        |              |                            |                               |                           |  |
| 63 | PSD Comments | 9/4/2013    | State Agency          | The reporting should come with some kind of simple label that people would be proud to have on their house  | please keep us in the loop on future multifamily group discussion | There would be value to have a score which acknowledged both energy demand (no renewables) and energy required (renewables included).<br>Tracking a simple rating 1-10 or (gold, silver.....) that clearly tied back to a key MMBtu metric range may be a way to have the best of both approaches.  |   |               |        |             |            |                        |              |                            |                               |                           |  |
| 64 | PSD Comments | 9/4/2013    | Advocacy Organization | We encourage the Working Group to review the resource, Building Energy Rating and Disclosure: Update and Lessons from the Field report for lessons learned and how they can be applied to rating and disclosure in Vermont. |   | NEEP agrees with the Working Group's approach that the energy label should be "asset" based.<br>We recommend a combination and slight reorganization of options #2 and #3 (see mock-up provided by NEEP)<br>NEEP would like to see the BEE (MMBtu/yr.) figure represented as a single number instead of as a rating scale.<br>NEEP recommends that greenhouse gas information be included somewhere on the label.<br>Recommendations for energy efficient upgrades should also be made available to the home owner.<br>Name: NEEP would recommend using Home Energy Estimate or Home Energy Assessment.<br>On-site generation of renewable energy could be incorporated into the "Energy Cost by Fuel" bar graph<br>Consider existing certification platforms as a requirement for professionals to participate in the program and align with existing channels.<br>NEEP would advocate that the working group pilot test HES and work with DOE to make any Vermont specific modifications. | NEEP's least preferred of the labels was option #1, as we feel it does not paint a complete picture. While it is possible to adjust the "built to code" and "high performance" energy marks on the scale based on the size of the home, it seems unnecessarily complicated. |               |        |             |            |                        | 1            | 1                          |                               |                           |  |

Building Energy Labeling Synopsis of Public Comments  
9/15/2013

| #  | Source       | Date Posted | Commenter             | General Comments   | Scope  | Positive/Constructive Comments   | Negative Comments  | Votes         |        |             |            |                        |              |                            |                               |                           |   |
|----|--------------|-------------|-----------------------|--|--|--|--|---------------|--------|-------------|------------|------------------------|--------------|----------------------------|-------------------------------|---------------------------|---|
|    |              |             |                       |  |  |  |  | Blog Choices  |        |             |            | Public Comment Options |              |                            | Other Options Noted in Public |                           |   |
|    |              |             |                       |  |  |  |  | 1. MMBtu/Year | 2. EUI | 3. DOE HEST | 4. \$/fuel | 1. BES Only            | 2. BES & EUI | 3. BES, EUI & Cost by Fuel | DOE's HEST                    | Also include Cost by Fuel |   |
| 65 | PSD Comments | 9/4/2013    | Software Vendor       | Overall, these graphic are good and easy to comprehend.  | Eventually, a score methodology that includes multifamily dwellings would be optimal | We feel ideally that total annual energy use and energy cost by fuel are the most important metrics to portray. It would be a best practice for the entire scorecard document to be uploaded to MLS to ensure that accurate scores are recorded. Onsite renewable energy production should be included as a net calculation. A minimum competency in building science be required (e.g. BPI building analyst, HERS rater, etc.). Training should be required, including combustion safety. we see the HES 1-10 metric as potentially useful to provide consumers with some degree of context | The energy use intensity graphic is unappealing from our perspective. The use of the "picket fence" image seems busy. Both suggested names are not consumer friendly Don't include energy intensity. |               |        |             |            | 1                      |              |                            |                               |                           | 1 |
| 66 | PSD Comments | 9/3/2013    | Individual            | Units of energy should be kWh (kilowatt-hours), not MMBtu. Energy/year is what really matters and should be shown. Minimum assessor training is a must.  |  | On the label, lower energy use should be on the left, higher on the right. Better to worse, in the direction we read. Same as the federal energy guide on our appliances, which everyone is familiar with. Colors should go green to red. Green for low energy use, red for high. On-site renewables should lower the annual energy use in the score.  | Don't include energy intensity.  |               |        |             |            | 1                      |              |                            |                               |                           | 1 |
| 67 | PSD Comments | 8/16/2013   | Advocacy Organization | Simplicity is good. But more than superficial information is needed. Anything that purports to provide useful, comparable information to consumers has to include relevant details   |  | It's hard to strike the balance between too simple and too complicated, but I think it lies in simple presentation with deeper layers of information embedded. Good luck!  | I think a comprehensible display that reflects the complexities is better. Maybe this is really a one-page report card, rather than a sticker-like label.  |               |        |             |            |                        |              |                            |                               |                           |   |
| 68 | PSD Comments | 9/3/2013    | Contractor            | Lots of questions but no recommendations, including:<br>Who would be the qualified assessors for this program?<br>What kind of training would be involved?<br>Why would a seller want one?   |  |  |  |               |        |             |            |                        |              |                            |                               |                           |   |
| 69 | PSD Comments | 9/3/2013    | Advocacy Organization | In terms of graphics and general info, I like option 3 (with some minor changes described below) as is tells me different things, and different people are going to be interested in different info. But in order for the lay person to understand several possibly somewhat complicated things at once, I think a couple of edits could be made to make it clearer. |  | I think you need to tie metrics to the score. So instead of the BEE being just 150, I think it should be 150 MMBtu. while the Cost of Energy Use label has the total at the top of the label, I would consider underlining the last energy line item (wood in the on-line example) and then adding a line at the bottom saying Total energy cost = \$4,000 the cost of energy is what they understand best and is most important for them  |  |               |        |             |            |                        |              | 1                          |                               |                           |   |

Count:

6 7 12 13 6 4 8 2 3