Hi Jess,

Here are EWEB's comments, as requested:

- EWEB and other stakeholders have raised concerns that the cost of a Home Energy Performance Score be kept to a minimum. The best way to assure that is to not require users to repeat efforts, such as entering data into multiple software packages in order to generate a score. This extra effort by users can be avoided in two ways:
    - Create flexibility about which software tool generates the score, as long as it is within a defined "error bar". This is how BPA has operated in the past with their Standard Heat Loss Methodology.
    - Choose a single software tool that accepts building data from other software tools. This is how the USDOE HEScore Tool's API works. This is also how Vermont's Home Energy Score works (see attached). EWEB prefers a scoring tool (preferably with no user costs such as the HEScore Tool) that accepts building data using an Application Programming Interface (API), and then generates a score and a report.
- EWEB's preference of options in the draft rules is therefore Option 1, where the USDOE HEScore Tool would generates outputs. However, some modifications are suggested:
    - The "score" would be a site MMBTU. This would overlap with Option 2 (and with Vermont's Home Energy Score).
    - Adopt a report format similar to the ETO's existing EPS, which includes benchmarks, annual costs in dollars, and greenhouse gas emissions.
- Justification of above EWEB preference:
    - The suggested system above provides more granularity in the score so that homes can be differentiated (in contrast to the 1-10 scale). This granularity would also allow utilities to create programs that encourage lower scores (i.e. offer rebates for score reductions).
    - Including the USDOE HEScore and logo in the report adds credibility with users, according to the report on Vermont's Home Energy Score.
    - The MMBTU is already in use by the Energy Trust of Oregon, and significant work has been done to create their current EPS format. Adopting the EPS format would build upon work already done.
    - The EPS in Option 2, where the asset rating is generated using the ETO tool, is not preferred. This is because the MMBTU score is generated using a weighting function that modifies the BTU calculation, in an effort to be politically fuel neutral, but effectively penalizes homes with heat pumps. This is not a preferred method for an electric utility such as EWEB. The methodology is discussed here: http://www.oregon.gov/energy/docs/Stakeholder%20Supplied%20Materials/Fuel%20Weight%20Memo_Final.pdf
    - EWEB would prefer to not use the USDOE HEScore as-is. The recommendations page often provides poor recommendations. The carbon footprint graphic is not very meaningful. Also, the log-in has been cumbersome for EWEB users. A score and a report unique to Oregon, with an API unique to Oregon, would be preferable for EWEB.
- Further comments:
    - Training for the USDOE program currently only accepts BPI, RESNET, or pre-approved training equivalents. If ODOE proposes to allow for their scoring system OTI training, and an experience-equivalent training, then this would need to be approved by USDOE if Option 1 is chosen.

- USDOE's HEScore currently is not able to score manufactured homes. Also, it is only available for multi-family homes (ie. 2-4 units) if they are in a "townhouse" configuration. If HB2801 is intended to create a system for these homes, and Option 1 (or any option) is chosen, how will that be done? Vermont has apparently limited their Home Energy Score to single family homes. This seems a reasonable approach, in order to get a system in place that address the large majority of homes. If there are difficulties with scoring non-single-family homes, then EWEB is OK with moving forward with a system that scores only single-family homes, with the understanding that the system will need to be expanded to address non-single-family homes at a future date.
- Would BPA recognize calculations using Option 1 (or any option) for utility custom projects? This is more of a question for BPA...
- In addition to the above suggestions, a central place is needed for users to send data in order to facilitate easy (and low cost) scoring. Can ODOE work with USDOE to create an API so that Oregon users can send data to the HEScore Tool? USDOE is discussing the use of a standard data format called HPXML, which would help data-sharing, and may be worth including in the HB2801 rules.
- The costs of QA are important. USDOE's HEScore pushes those costs onto their Partners. EWEB is one such Partner, and the QA has worked out reasonably well. For a state-wide system, who would be the USDOE Partner, and therefore bear those QA costs? This would probably be the same entity that would create an API.

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