



Warren Cook
Manager, Energy Conservation
Oregon Department of Energy
625 Marion St. NE
Salem, OR 97301-3737

Dear Mr. Cook:

As you know, Peter West and I were copied on the letter from stakeholders to you dated February 3, 2014 and expressing concern regarding a verbal straw man proposal for a voluntary energy performance score approach to be examined at a webinar on February 6th. Energy Trust concurs with the concerns expressed in the February 3rd letter. While Energy Trust has not yet seen the straw man to be proposed on February 6, 2014, we base our view on the verbal outline you provided last week. We are most concerned about the proposal for a single scoring system that deviates significantly from the energy performance score system and process developed through Energy Trust (the "EPS") in partnership with contractors throughout Energy Trust's service territory.

In 2006, Energy Trust embarked on an extensive technical and stakeholder process to identify a home energy asset score. The objectives were for customers to have an accurate picture of the "miles per gallon" of home energy use and to empower the Home Performance contractor community to educate customers on the value and benefits of a home energy improvement. Several possible scoring approaches were examined through this process, including U.S. DOE's Home Energy Score ("HES").

After several years of research, piloting and investment Energy Trust and stakeholder input, EPS was selected as the best option. In 2009, the EPS was adopted for new homes, and in 2012, the EPS was modified and adopted for existing homes. Since adoption, our validated evaluation and analysis underlying the EPS supports findings that EPS has acceptable accuracy with relevant benchmarks for our region. The Home Performance community and contractors have embraced the tool. To date more than 7,000 EPS scores have been issued in the marketplace, and contractors and new home verifiers use EPS regularly.

Further, since adoption, a number of other systems, tools, and processes have been built in the region to support the EPS. For instance, the Axis database created by Northwest Energy Efficiency Alliance for new homes allows Energy Trust trade ally verifiers to generate an EPS simply through one-time data entry into NEEA's regional verifier data base. CakeSystems by Earth Advantage allows Home Performance contractors and Clean Energy Works to generate an EPS with data already collected in the course of an audit and has functionalities that make for easy work scope generation and bid changes with simplicity.

Energy Trust's development efforts found HES less accurate than EPS, and the consensus decision of the stakeholders was to move forward in development of the EPS. Our findings from this process may be useful to ODOE in developing an energy performance score approach. Energy Trust would be happy to present information to ODOE and the working group to explain the technical bases for this decision. We believe that this would be useful information for the HB 2801 rulemaking process, either before the February 6th webinar or afterwards.

It may be that the HES has been improved since our review. If so, it should also be a candidate score for the market to consider. But it should not be the exclusive score and push aside the experience invested and market penetration achieved by the EPS.

Please do not hesitate to contact me with any questions on this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Ferington". The signature is fluid and cursive, with a prominent loop at the end.

Diane Ferington
Energy Trust of Oregon