

Hi Jess,

Our comments:

1. Energy performance score system
 - Option 1 – Integrate EPS or other proprietary tool and USDOE – This is probably overkill. We understand that the tools provided by DOE are sophisticated and open/free to everyone, however, the HES itself is an inferior metric given that the 1-10 scale will need to be recalibrated as code standards evolve. Also, we're all in agreement that the support of the Realtors is paramount and we're concerned that market confusion could disengage them.
 - Option 2 – Adopt EPS – **Option 2 is our recommendation**. We feel that the basic components of the EPS can be modified to meet the needs of all Oregonians. Also, the EPS has a track record of market acceptance and brand recognition. Further, EPS scores can currently be entered into the MLS—Realtors are familiar with it.
 - Option 3-Retain existing framework—We're uncertain as to what exactly the existing framework is.
 - Other Options – Your Ideas – see below
2. Training programs – Training requirements need to include not just how to audit the home, but also on how to use the tools

Our Recommendations:

- **Wherein:**
 - Assessors have to undergo a basic level of training to produce the score, and have to use an approved tool to do the score; we acknowledge that two completely different tools would not likely produce the same score every time.
 - It is unclear who pays for the score but presumably, 99% of the time it is going to be the homeowner... ultimately, it's a voluntary system, so the burden of the cost appears to be on the homeowner.
 - Given that the procurement of the score is voluntary, disclosure will also be voluntary; a logical place for the score to show up would be in the MLS.
 - Buyers could demand the score as a condition of sale, and realtors could write it into the contract for purchasing a home.
- **We recommend that the metric for Oregon's State Score be, at minimum, be an asset-based MMBtu (site energy, not source), since this value can communicate electric, natural gas, and other fuel energy consumption in one number; it also provides an apples-to-apples comparison**
- **The tools allowed to produce the score should be pulled from a pre-determined Qualified List (i.e. a tool "QPL")**
- **The assessors must have a minimum level of training in order to produce the State-endorsed score**

Thanks,

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