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Regarding: Energy Performance Score

Dear Peter:

Thank you for hosting the Energy Performance Score (EPS) stakeholder meeting on January 23. The Oregon Environmental Council appreciates the time and effort ETO has put into developing a tool that can help drive energy efficiency gains in the residential market.

An EPS is critical to accelerate efficiency gains for homeowners. Oregon's residential market currently lacks a "miles-per-gallon" rating equivalent, making energy-based purchasing decisions much harder, or impossible in some cases. We support the expeditious release of a tool that satisfies the following goals:

1. The tool should be easily understood by consumers. It needs to be graphic rich and include benchmarks that help contextualize a score for a consumer. For example, how does a score of 60 compare to a home built to code? If improvements are made, what will the expected score be? An energy score based on BTUs-per-year expected consumption (as modeled under normalized conditions, not operational consumption) seems the most straightforward.

2. The tool should include at minimum an overall energy score (equivalent to an MPG rating for cars) a carbon score, and estimated energy costs. The three pieces of information should *always* be coupled together. They create the most complete and valuable energy information for a consumer. The score sheet should also include the date and information for the person/company that generated the score.

3. The energy score should be oriented towards the end goal of Net Zero Energy use. The ultimate efficiency scenario is one in which a home produces as much energy as it consumes. For this reason, the Oregon Environmental Council opposes a score or index that would eliminate this orientation. An energy score oriented towards zero where "lower is better" is directionally consistent with energy costs and a carbon scores that are also oriented towards zero. Consumers already understand that lower calories and lower fat are better for them. They will be able to understand that lower energy, lower carbon, and lower costs are also beneficial.

4. The tool should be designed so that movement is meaningful. An energy score with more granularity encourages maximum energy efficiency measures

because each measure counts. We are very concerned that an index, such as one with a range from 1-10, would encourage only the minimum effort to move from a 7 to an 8. Cost effective measures that theoretically would move a house to an 8.2 would be lost in the rounding, and may not be acted on. Those would be lost energy savings, and counter to ETO's goal to maximize cost effective energy efficiency. The EPS for new buildings has proven effective and beneficial for homebuilders who have built beyond code and beyond the Energy Star designation.

5. A tool should enable consumers to compare homes across fuel types. That would be most practical and useful to a consumer.

6. A tool should help show the value of efficiency improvements, both to lenders and for homeowners who have invested in upgrades.

7. The tool should be credible. It needs to have a limited margin of error and should not be easily gamed.

We appreciate the complexity of the current debate but believe that if an energy score, carbon score, and estimated energy costs are always coupled together, then the overall tool is fuel neutral and helps consumers understand the efficiency and carbon consequences of specific choices. Different factors are used to calculate energy consumption and carbon impacts, so it is reasonable that those scores would vary based on differing circumstances. Similarly, energy costs will vary depending on current energy prices and the ratio of electricity to gas (or other fuels).

The carbon score would be most useful if it is utility specific. Actions of customers in PacifiCorp's and EWEB's territory have different climate impacts by virtue of differences in each utility's energy mix. Switching from natural gas to a heat pump may increase carbon in PacifiCorp's territory, while reducing carbon in EWEB's territory. We also know that the carbon impact of electricity will change over time as Oregon's energy mix becomes cleaner.

We also hope that the score will not be too complicated to administer or be burdened by too many "black box" calculations. An indexed score will need more consistent updates based on changing technology and other factors.

Please don't hesitate to contact me with any questions. We look forward to working productively on a successful energy performance system for Oregon.

Sincerely,

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