Bureau of Planning and Sustainability
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Energy Trust of Oregon
421 SW Oak Street, Suite 300
Portland, OR 97204

Feb 14, 2012

RE: EPS Stakeholder feedback

On behalf of Portland's Bureau of Planning and Sustainability, we are writing to provide feedback on the Energy Performance Score (EPS). We value the time and effort that Energy Trust has devoted to the development and study of this tool and appreciate the opportunity to provide input.

We believe that the EPS is a useful rating tool that provides homeowners with an objective and quantitative view of their home's energy efficiency. Providing homeowners with this type of metric has two benefits: to motivate customers to undertake efficiency improvements in their homes and to drive the market toward accurately valuing, at time of sale, homes based on their relative energy efficiency. This strongly aligns with the City's efforts under the 2009 Climate Action Plan to reduce carbon emissions through a variety of strategies that promote energy efficiency in the residential building sector.

Given the exhaustive nature of the research and evaluation of EPS to date, we strongly encourage Energy Trust to decide either to fully promote EPS for existing homes or to exit the energy rating discussion and allow the marketplace to select a product. Many stakeholders in Oregon's residential efficiency sector are eager to start using a rating tool. We do not think the market will benefit from further testing and evaluation that is not likely to significantly improve the product but that would create additional delays to the implementation of EPS or an alternative rating tool.

If Energy Trust decides to move forward with EPS, we encourage you to:

- promote a package score containing energy usage (btu), energy cost ($) and carbon (tons);
- emphasize the annual energy costs rather than monthly costs; and
- use a methodology that will produce a consistent energy usage score for the same home even if utility energy sources change over time.

We understand that Energy Trust has concerns about how the current EPS provides a inconsistent message of "save energy, save money" with respect to electrically heated homes. In our opinion, this should not be an obstacle; if Energy Trust is striving to deliver a comprehensive and technically accurate metric of a home's energy efficiency, cost of operation and environmental impact, then the perceived inconsistency of the message is not something that can or needs to be resolved.

However, if the predominant goal is to provide the least complicated message to consumers, we believe changing the EPS to an indexed metric is a viable solution. In this case we would encourage you to embrace a 0-100 or similar scoring system that is simple and intuitive.

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If Energy Trust decides to exit the discussion without endorsing a specific rating tool, we encourage you to support the energy rating marketplace through contractor training of energy scoring tools, including both EPS and the Department of Energy's Home Energy Score (HES).

Thank you for the opportunity to comment.

Sincerely,

Andria Jacob
Senior Program Manager

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Program Coordinator