

November 3, 2017

Chairman Greg Walden
House Energy and Commerce Committee
2185 Rayburn House Office Building
Washington, D.C. 20515

Ranking Member Frank Pallone
House Energy and Commerce Committee
237 Cannon House Office Building
Washington, D.C. 20515

Dear Chairman Walden and Ranking Member Pallone,

The undersigned organizations appreciate the opportunity to provide comments on the Energy Star Reform Act. Our primary concern is that moving responsibilities from the U.S. Environmental Protection Agency (EPA) to the U.S. Department of Energy (DOE) poses risks to the success and effectiveness of ENERGY STAR. ENERGY STAR is a public-private partnership that helps consumers and businesses, including low-income residents and affordable housing developments, to save money by investing in energy efficiency and reducing negative environmental impacts. ENERGY STAR is a widely recognized symbol for energy efficiency, with a brand awareness of about 90%. In 2015 alone, American consumers and businesses saved over \$34 billion with the help of ENERGY STAR. Since 1992, ENERGY STAR has assisted companies and consumers save \$430 billion on utility bills.

ENERGY STAR works with Habitat for Humanity and the U.S. Department of Housing and Urban Development's HOME Investment Partnerships Program, to develop efficient, affordable housing. In 2015, more than 3,900 ENERGY STAR-certified homes were built within the affordable housing sector in partnership with HUD. In total, 131 chapters of Habitat for Humanity have partnered with ENERGY STAR to build over 14,000 efficient, affordable houses. These projects lead to significant utility bill savings, which especially helps low-income families.¹

The undersigned are concerned that a move from EPA to DOE would pose risks to the strong performance of ENERGY STAR and negatively impact its use in affordable housing programs to help low-income families live affordably in their homes.

EPA has grown the program to more than 60 product categories and does an excellent job ensuring the product eligibility requirements are kept up to date and relevant. It could be difficult to mesh the more flexible process for setting ENERGY STAR specifications with the formal regulatory minimum standards setting process used by DOE. Previously, when the program was at DOE, the specification setting process got bogged down and many specifications were out of date.

EPA has a skilled and experienced staff who run the ENERGY STAR program. Current EPA staff has expertise in marketing and brand management that is essential to the program. EPA has done an excellent job building awareness and confidence in the ENERGY STAR brand.

Additionally, if the core operations of ENERGY STAR were to move, **DOE would require additional resources** to address existing market engagement and program activity. However, the Administration's FY 2018 budget request and the House FY 2018 budget each proposed funding reductions at the Office of Energy Efficiency and Renewable Energy, where ENERGY STAR would live if relocated.

¹ <https://www.nrdc.org/sites/default/files/energy-star-delivers-big-fs.pdf>

Nor is moving the program necessary to ensure DOE participation. **EPA and DOE currently have a functioning Memorandum of Understanding** on the Energy Star Program. The Memorandum is an effective mechanism to coordinate changes to the program as needed.

Given the effectiveness of the ENERGY STAR program and its positive economic impacts, the undersigned would encourage further study, perhaps by the Government Accountability Office (GAO), on the potential advantages and disadvantages of relocating ENERGY STAR before acting to relocate the program.

Thank you again for the ability to provide input on the draft proposal. To discuss any of these comments in further detail, please contact Rebekah King, Policy Associate, National Housing Conference, (202) 466-2121 x248, rking@nhc.org.

Sincerely,

Chester Community Improvement Project
Foundation Communities
Enterprise Community Partners
Habitat for Humanity of Northern Virginia
Mercy Housing
National Housing Conference
U.S. Green Building Council

Cc: House Energy and Commerce Committee