

November 29, 2016

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket 16-057-15 – In the Matter of: The Application for Approval of the 2017 Year Budget for Energy Efficiency Programs and Market Transformation Initiative

Utah Clean Energy is generally supportive of Questar Gas' 2017 ThermWise budget, and has several comments about specific elements of the proposal below.

ThermWise Builder Program

Utah Clean Energy supports the new HERS-based tiers proposed as part of the Builder Program. The proposed tiers align with a new residential energy code compliance method (called the "Energy Rating Index Compliance Option") that became effective for the state of Utah on July 1, 2016.¹ The specific HERS Rating values proposed by the Company are appropriate as they are more efficient than the energy rating values in the updated residential energy code. To help ensure accuracy of HERS Ratings submitted to the program, we recommend that the new construction program incorporate quality assurance standards developed by RESNET.²

We also recommend that the new construction program works with realtors and/or sales agents and other new homes professionals to widely publicize the specific HERS Ratings of each home participating in the program. Wide promotion of HERS Ratings will help increase consumer awareness and demand for energy efficient homes. For participating homes that are built for sale, this should include a program requirement to post homes' HERS Ratings onto the Multiple Listing Service (MLS) residential listing for the home, where applicable. The Wasatch Front Regional Multiple Listing Service's Input Form includes a "Home Energy Rating" field on its Residential Listing Input Form (see attached, page 2).

When a home is listed for sale using this form, the "Home Energy Rating" box can simply be 'checked' by the person who lists the home for sale. In addition, the form includes a "Remarks" section where the specific HERS Rating number can be listed. Given that the Wasatch Front Regional Multiple Listing Service is one of the primary MLS systems in Utah (its public website is www.utahrealestate.com), and given that this particular MLS uses a form and a Remarks section to note a home's HERS rating, we believe that it is reasonable for the program to require sales agents to complete this field if a participating home is listed for sale on the this MLS.

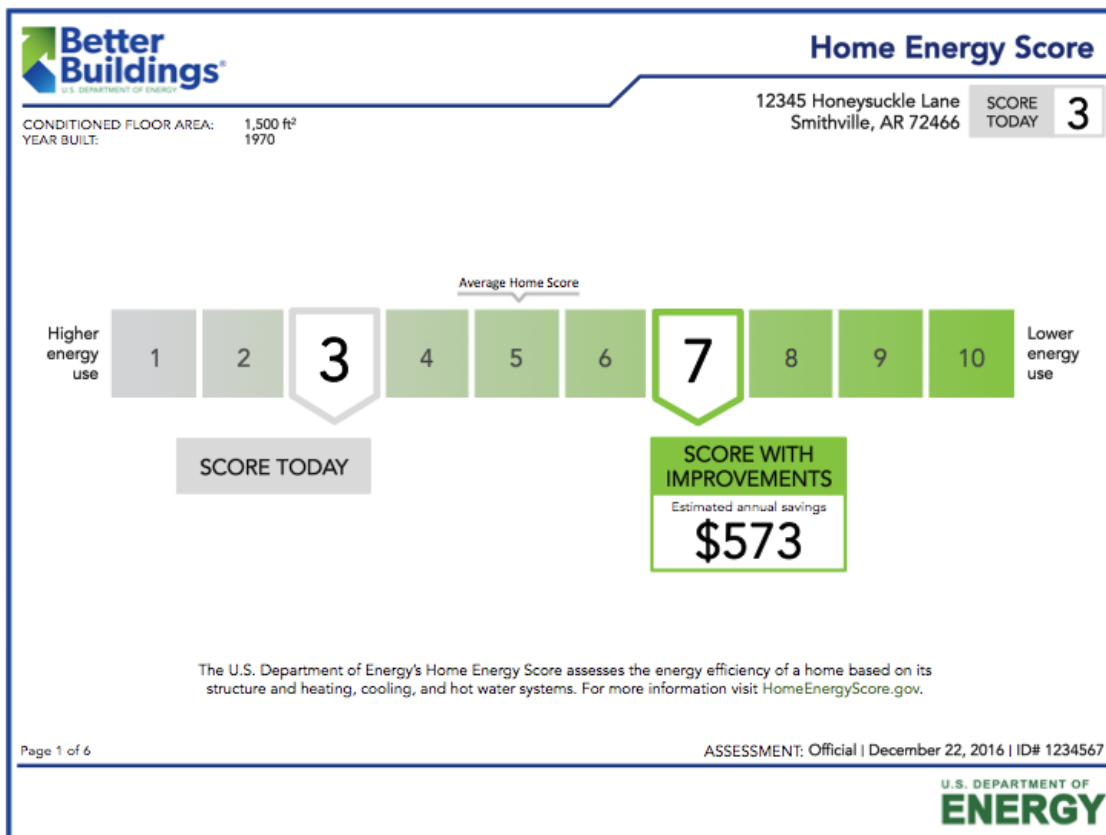
¹ House Bill 316 (2016), *Building Code Review and Adoption Amendments*, <http://le.utah.gov/~2016/bills/static/HB0316.html>

² RESNET is the body that oversees implementation of HERS Ratings nationally. For example, see: RESNET, Mortgage Industry National Home Energy Rating Systems Standards: <http://bit.ly/2fYY1d4>

This recommendation also complements recent changes made by the Utah Association of Realtors to its *Buyers Due Diligence Checklist* and *Sellers Property Condition Disclosure* forms. These changes incorporate new “Energy Efficiency” sections into both of these forms. Therefore, we believe our recommendation is consistent with the industry’s current efforts and could be easily implemented.

Home Energy Plan

Utah Clean Energy supports the continuation of Questar’s Home Energy Plan. We believe this is a very strong component of the ThermWise program. However, the Plan as it is currently implemented lacks one component: a simple-to-understand and comparable “energy rating” similar to the HERS rating that is available for new homes as noted above. The U.S. Department of Energy has developed a rating program specifically for existing homes, called the Home Energy Score (HES), which can be implemented as an add-on to Questar’s Home Energy Plan using the existing framework of the Plan.³ The HES report includes an easy-to-understand and comparable score that presents the results of the home energy assessment on a 1 to 10 scale, noting the current efficiency level of the home as well as the home’s estimated score if recommended energy improvements were implemented. See the graphic below.



The HES helps consumers more easily understand the relative energy efficiency of their home as compared to other existing homes, and quantifies the estimated financial impacts of implementing

³ U.S. Department of Energy, Home Energy Score <http://betterbuildingsolutioncenter.energy.gov/home-energy-score>

recommended efficiency improvements. As of November 13, 2016 over 50,000 scores have been completed around the United States, yet there are no reported Scores in Utah.

Utah Clean Energy recommends that Questar collaborate with the U.S. Department of Energy's Home Energy Score staff in 2017 to develop a pilot program integrating the HES into Questar's successful Home Energy Plan analysis and reporting software.⁴ We recommend that the pilot include at least 100 homes during the program year, and includes strategies to collaborate with Rocky Mountain Power on collecting electricity data points. Finally, we recommend that Questar's Home Energy Plan staff share the results of the pilot (including costs, challenges, and strategies to implement the HES on a permanent basis) with the energy efficiency advisory group.

Sponsorship of Salt Lake Community College Energy Management Program

In its proposed budget, Questar Gas proposes to continue its sponsorship of the Salt Lake Community College Energy Management Program. Utah Clean Energy supports this proposal. The proposed \$14,000 sponsorship comes from the utility's market transformation budget, which is designed to promote and increase awareness about natural gas energy efficiency and Questar's ThermWise incentive programs.

The SLCC Energy Management program has a strong track record of success, enabled in part by Questar's sponsorship. According to the Program coordinator, since 2010 49 students have graduated with an A.A.S. degree in Energy Management and 127 more students have participated in program classes for a different degree, certification, or for professional development. At least 58 graduates/former students are now actively working in the energy efficiency/management field in Utah, including as home energy raters, energy engineering, or energy managers.

Questar's sponsorship of the Energy Management program through the market transformation budget helps to achieve the goal of improved awareness of efficiency and ThermWise programs by directly supporting the training and education of Utah's energy efficiency workforce. Utah Clean Energy recommends that the Commission approve Questar's continued sponsorship of the Energy Management program at part of the ThermWise program's Market Transformation budget.

Energy Code Training

Utah Clean Energy supports continuation of Questar's sponsorship of statewide energy code training at the proposed level of \$50,000. The energy code trainings are coordinated by the Office of Energy Development and are offered to contractors, building code inspectors, design professionals, and other building professionals. The training program provides needed education about proper implementation of and compliance with the current energy codes and serve as the primary energy code training in Utah. This training continues to be important since there were numerous changes made to Utah's commercial and residential energy code in the 2016 General Legislative Session.

⁴ The Department of Energy's Home Energy Score program staff can provide technical support to partners, such as utilities, to develop an Application Program Interface, or "API," which enables the Home Energy Score and Home Energy Plan software platforms to communicate on the back end.

Thank you for your consideration of these comments.

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Energy Efficiency Program Director
Utah Clean Energy

Cc: Questar Gas
Division of Public Utilities
Office of Consumer Services