11/17/2017 Comments from Wrightsoft Corporation

Comments on Energy Simulation Tool Approval Technical Assistance Manual, November 15, 2017

These comments address Appendix R-6, Energy Rating Index Alternative Method, Pages R-47 – R-63.

1. TAM Section 6.3 refers to a results spreadsheet (Florida ERI-Test\_Results-form.xlsx) that ERI software is required to submit for acceptance, but the spreadsheet is not available. Because Section 6.3 contains multiple undocumented criteria and methods presumably behind the spreadsheet, it is premature to issue this Section R406 of the TAM for approval. Since the authors of the acceptance criteria are also vendors of Energy Gauge, this creates an unfair advantage for our competitors.
2. The author of the TAM (Florida Solar Energy Center) has converted the R406 ERI report to a RESNET HERS document based on Energy Gauge and can only be provided by a RESNET Rater. This action excludes ERI Raters certified by other organizations than RESNET. Section R406 of the Florida Code makes no mention of RESNET or HERS:
   * + The sample report (Form R406-2017) provided on page R-58 uses a RESNET copyrighted HERS graphic that can only be used by a RESNET-approved software vendor.
     + The Rating Provider section of the form shows a location for a seal, “Insert RESNET Rating Provider Seal Here”, “RESNET QA PROVIDER”, “The Home Energy Rating Standard Disclosure for this home is available from the Rating Provider.”
     + Finally, “To determine if a provider is properly accredited go to: www.resnet.us/professional/programs/search\_directory.
3. According to recommendations in Section R6.6, “large variance” from the sample reports provided “is not recommended”. Since the sample reports are slightly modified versions of existing Energy Gauge ERI reports and contain additional data not required by ANSI 301 reports, the TAM is forcing competitors of Energy Gauge to use their format and their preferred data presentation even if the RESNET HERS references are removed. Since the Energy Gauge documents are already generated, other vendors are forced to invest in new development to match up with Energy Gauge documents. This gives an unfair advantage to Florida Solar Energy Center.

These reports should be reviewed and revised to conform to actual reporting requirements required by the Florida Code.