



To: North Carolina Housing Finance Agency  
[rentalhelp@nchfa.com](mailto:rentalhelp@nchfa.com)

Subject: 'Section IV ENERGY STAR CERTIFICATION' in 2020 draft Qualified Allocation Plan (QAP).

At Southern Energy Management, our vision is to improve the way people make and use energy. We believe in a walk-jog-run approach with incremental goals for our partners to be more energy efficient without making it a burdensome process.

We appreciate that LIHTC developers are operating in a context of rising construction costs and thin margins, and therefore are sensitive to any additional requirements. However, we also believe that there is an opportunity to improve energy efficiency standards that will benefit rental tenants through reduced utility bills, improved health and safety, reduced maintenance and a lower environmental impact in their home.

As many other states (e.g. Virginia, South Carolina and Georgia) have already done, North Carolina can increase its energy efficiency standards in cost-effective manners that benefit all stakeholders. At present, the program's minimum energy efficiency standard of ENERGY STAR® version 2.0 has been surpassed by version 3.0 and falls below North Carolina's new 2018 Energy Conservation Code requirements in key areas including Total Duct Leakage.

As an active member of the North Carolina Building Performance Association (NCBPA), we support their 2020 QAP comments and recommendation that, as a first step, the NCHFA analyzes cost-effective energy efficiency requirements and options for the 2021 QAP with necessary stakeholder inputs.

Thank you for the opportunity to provide feedback on the draft 2020 QAP and please reach out if you have any questions about our comments.

Sincerely,

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