To: taxcreditquestions@schousing.com

Re: South Carolina Draft 2027 Qualified Allocation Plan

From: Newport Partners LLC

Newport Partners, as the implementation contractor for **the U.S. Department of Energy's Efficient New Homes Program** (DENH) (formerly the Zero Energy Ready Home (ZERH) Program), the leading federal program for residential energy efficiency, congratulates SC Housing on the sustainability criteria in its 2027 QAP. In the Draft 2027 QAP Appendix B Section R. ENERGY STAR, SC Housing requires New Construction to meet the current version of ENERGY STAR MULTIFAMILY New Construction. In Appendix C of the 2026 QAP there was a section where up to 5 points could be scored for certification under several green building programs, which was removed in the 2027 Draft QAP. In this comment, we'd like to offer background information on the DENH program and how it can support reduced energy costs, reduced grid loads, and healthful indoor environments in affordable housing.

The DENH program is a voluntary certification program for high-performance buildings designed to reduce energy costs, support healthy indoor air environments, and reduce the load new homes place on the grid.

- DENH projects are at least 15 to 20% more efficient than buildings designed to meet recent energy standards such as the 2021 IECC, based on the analyses conducted in developing the current Version 2 single family and multifamily program requirements. This improved efficiency can reduce household energy costs now and into the future.
- DENH buildings include dozens of features that promote good indoor environmental quality, such as efficient ventilation systems, effective air filtration, and low emission building materials. These features support a more comfortable environment and improve IAQ for residents.
- DENH homes reduce their peak load on the grid by about one-third compared to typical new homes, based on modeling analyses. This reduction can help reduce the grid impact associated with new housing.

Additionally, the DENH program builds upon the ENERGY STAR program, requiring ENERGY STAR certification as a prerequisite. ENERGY STAR certified homes improve efficiency beyond code while using building science-based provisions, so the building performs well as a system. DENH requires added efficiency along with targeted measures such as a complete package of IAQ features and locating HVAC ducts in optimized locations. Both DENH and ENERGY STAR Homes use a whole-building, performance-based approach to boost efficiency while also giving developers design flexibility in how they meet the programs. Developers find value in the differentiation between the programs, with higher performing buildings gaining recognition by with DENH certification. Neither program charges a fee for certification.

The DENH program is currently referenced in the QAPs of 14 states, providing examples of how states have incorporated the program into affordable housing policies and program requirements.

The program publishes many free resources online, including builder/developer training, technical support, and hundreds of real-world project case studies. As DOE's DENH implementation contractor, we are available to provide technical information and program resources to SC Housing and to affordable housing developers seeking additional information about DENH certification. If you have any questions about the DENH program and how it supports high-performance affordable housing, we would be happy to provide further information.

Sincerely,
Jamie Lyons, P.E.
Vice President, Newport Partners