

memorandum

DATE: August 9, 2016
REPLY TO:
ATTN OF: EE-5W
SUBJECT: Supplemental Approval of Montana's Single-Family and Manufactured Home Energy Audit Procedures for the Weatherization Assistance Program - LEDs
TO: David Rinebolt, Program Manager, Weatherization Assistance Program, U.S. Department of Energy, Headquarters

To ensure that energy audit procedures of sufficient technical rigor are used in the U.S. Department of Energy's (DOE's) Weatherization Assistance Program (WAP), grantees must submit their energy audit procedures to DOE for approval every five years. DOE last granted conditional approval for Montana's energy auditing procedures for single-family and manufactured homes on March 23, 2016.

Subsequent to that approval, Montana has requested that DOE allow light emitting diode lighting (LEDs) as an energy conservation measure to replace existing lighting. DOE received the following materials to assist in its review:

- Three sample calculations and backup information showing cost effectiveness of LED replacements, including worst case (highest LED cost) limits
- LED characteristics, including prices and proposed lifetimes.


Although LEDs are not specifically listed in Appendix A for use in WAP, LEDs are now widely available and widely used and accepted as cost effective replacements for conventional lighting in residential and commercial applications due to LEDs' relatively high efficacy, long life and proven reliability. Montana's submittal was reviewed in accordance with Weatherization Program Notice (WPN) 16-7 and was found to comply with §440.21(b) of the final rule, which allows unlisted materials upon application from any State and approval by DOE.

Furthermore, Montana's approval allows LEDs to be implemented as a general heat waste reduction weatherization material, which per DOE regulation does not require inclusion in a site-specific energy audit when documentation is provided of cost-effectiveness and the circumstances under which such materials will be used. Based on review of the submitted material, Montana is approved to use LEDs in WAP with the following restrictions:

- DOE's conditional approval of Montana's energy audit procedures remains in place until Montana submits and DOE approves the field guide for manufactured homes.
- This approval of energy audit procedures does not constitute approval of other measures not listed in Appendix A, or not otherwise approved by DOE, for expenditure of Weatherization funds.
- This approval of energy audit procedures does not constitute approval of a state's health and safety plan or the materials listed therein for purposes of allowable expenditures.

Approval of Montana's Single-Family and Manufactured Home Energy Audit procedures still expires on March 23, 2021. The State must submit their energy audit procedures to DOE in a timely manner for re-approval by that date.

Please provide this information to the State of Montana. If there are any questions, please contact the Project Officer, Jon Muckey at (202) 287-1809.



AnnaMaria Garcia
Program Director
Weatherization and Intergovernmental Program
Energy Efficiency and Renewable Energy