**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*  
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**Comment 4-Would participating in this pilot invalidate ENERGY STAR Certification**

**Regarding: “Recommendations for a RESNET Pilot Program for Off-Site Construction:”**

* RESNET staff should seek input from the ENERGY STAR and Zero Energy Ready Home programs on the off-site construction inspection and oversight protocols.

Can homes pursuing ENERGY STAR or DOE ZERH in this pilot program even be legitimately certified? This pilot is not an approved alternative to meeting existing ENERGY STAR or other EEP requirements.

ERI for code compliance, EEPs like ENERGY STAR Certifications and DOE ZERH Certifications may currently be conducted independently of RESNET and do not require the use of a RESNET Certified individuals if the homes utilize approved Home Certification Organizations (HCO) or Multifamily Review Organizations (MRO).

The 45L tax credit tied to ENERGY STAR and DOE ZERH certification may become a driver for an increasing selection of HCO and MRO organizations. This is an opportunity for RESNET to work with ICC, EPA, and DOE to demonstrate that RESNET Certified individuals are the gold standard in quality, by demonstrating that innovations can increase quantity AND quality.

I’m saying that TikTok for Mods is not the innovation that is needed. Quality inspections requiring qualified individuals offering dedicated attention to the unique challenges presented during construction. Sampling was a bad idea for HERS Ratings and for ENERGY STAR, so there is no reason to believe it will be a promising idea for Modular Plants.