

WPN 22-8 - Streamlining - FREQUENTLY ASKED QUESTIONS

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Implementation

Q. Which priority list should be used for 2-4 unit buildings?

- A. As outlined in WPN 19-4, buildings with less than 5-units are considered single family homes from the perspective of the energy audit. This does not change the reporting for these unit types but does allow the single family site-built priority list to be used for this housing stock.

Q. The regional priority lists provide target values for air infiltration and duct sealing, but what if despite the best efforts, we are not able to reach the targets?

- A. DOE expects WAP Grantees to establish clear written policy for how missed targets will be addressed by the final inspection and monitoring procedures. Appropriate actions include: allowable percentage of variance thresholds with recompense actions depending on the amount the target is missed by; required documentation of where unsealed leaks exist through zone pressure diagnostics if targets are not met; methods to provide specific feedback for future improvement to installers when targets are not met; a process whereby the Subgrantee is permitted to pass infiltration measures that do not meet targets within a given threshold, but requires additional Grantee approval when targets are missed by a large margin. These written policies should become part of the Grantee's written energy audit procedures and provided to Subgrantees.

Q. The regional priority lists allow for modeling the building with all mandatory measures included to determine alternate heating or cooling system replacements. Does the energy audit have to be reviewed by DOE prior to implementation in the case of multifamily buildings?

- A. If the Grantee does not have a current DOE-approved energy audit tool for the building type (except for MF in certain scenarios. See question above), then any modeling performed in conjunction with the implementation of the regional priority list must be submitted for DOE approval prior to work beginning. If the Grantee already has a DOE-approved energy audit tool for the building type, then work may proceed without additional review by DOE.

Q. Does DOE allow a hybrid energy audit/PL approach that includes portions of the regional PL, but utilizes a site-specific energy audit for other portions?

- A. No. The auditor should select to either perform a site-specific energy audit or utilize the regional PL for a project if it fits the parameters of the PL.

Q. Certain measure installations mention “accessible” as a qualification for the applicability of a measure (e.g., floors over unconditioned foundations). What defines ‘accessible’?

- A. If the area can be accessed safely it would be considered accessible. Grantees are encouraged to define the extent of some allowable alterations as they relate to implementation of the regional PLs. As a reminder, Grantees must have policies to identify what is applicable/accessible.

- Q. What documentation is required for measures that are not deemed “applicable” from the priority list for a specific dwelling?**
- A. If a measure is determined to not be applicable, then the client file must contain documentation which justifies/verifies the classification of not applicable. An example of a measure that could be deemed not applicable is: a unit has no ductwork outside the thermal boundary of the unit; sufficient documentation would be photos of the ductwork location and condition and a statement in the field data collection form that “all existing ductwork is inside the thermal boundary.”
- Q. What should be done if a client or landlord declines a measure that is deemed “mandatory” from the Priority List?**
- A. The same process should be followed as outlined in WPN 19-4 – Attachment 8. All “mandatory” measures should be treated as “major” measures when implementing the PL.
- Q. What limitation exists for project expenditures of DOE WAP funds when using the DOE sponsored regional priority lists?**
- A. The Average Cost Per Unit (ACPU) as outlined each Program Year (PY) applies to all projects weatherized in the WAP. Some optional measures contained within the PL do have individual cost caps (e.g., refrigerators).
- Q. Are units completed with the use of a PL reported separately?**
- A. There is no change with respect to the reporting of units when the priority list is used on a project rather than a site-specific audit.
- Q. The LRMF and SBSF PLs reference foundation spaces that are unconditioned and conditioned but make no mention of how to address “unintentionally conditioned” spaces. How should these spaces be treated?**
- A. Grantees are encouraged to clearly direct this decision making process in their energy audit procedures. While “unintentionally conditioned” spaces do exist in some homes due to heat lost to the space from uninsulated pipes/ducts and/or equipment motors, the auditor must make the decision whether the space should be treated as inside or outside the thermal boundary.
- Q. If DOE funding is applied to a unit, must all measures meet DOE rules regardless of funding?**
- A. Only the measures installed in the dwelling that use any portion of DOE WAP funding must meet DOE WAP rules. However, when applying the priority lists any measure that is included in the dwelling that is ranked higher than the last measure with DOE funds applied must meet the minimum installation requirements outlined in the appropriate PL (e.g., regardless of the funding source attic insulation must be installed to minimally the R-value outlined in the PL).
- Q. If any DOE funding is applied to weatherize a unit, do all DOE Health & Safety policies apply?**
- A. Yes. The Grantee’s DOE-approved H&S plan is a required part of the program, and it applies to all units completed with DOE WAP funds regardless of the energy audit method.

- Q. My service territory has more climate zones than what is contained in the climate map. Will DOE consider changing the zoning for my service area?**
- A. During the development process DOE received feedback that a key to adoption of regional PLs would be keeping the regional map simple and sticking with Grantee borders was the preferred method. However, if a WAP Grantee would like to use a regional PL other than that to which it is currently assigned they may submit a request to DOE for permission to use multiple PLs within their service territory. To support this request, the Grantee should provide DOE with a clear map or table showing the areas to be served, corresponding climate data, and the PL to be applied in each area. ASHRAE and the International Code Council both provide county by county climate map data which can be used to justify the climate zone differences when requesting to use more than one regional PL in a Grantee territory.

Resources

- Q. Do Grantees have to use the checklists provided by DOE as resources for each housing stock if they implement the regional priority lists?**
- A. No, these were developed as optional resources which assure the minimum documentation requirements of the energy audit is provided in the client file. If those optional checklists are not adopted, Grantees are required to develop policy and procedures which ensure sufficient documentation of the priority list's applicability and implementation.
- Q. Our program already has health and safety and combustion appliance inspection checklists/forms that we are currently using. Do we have to adopt all the DOE sponsored checklists for use in our program?**
- A. Grantees may continue to use existing forms for health and safety and combustion appliance inspections. The DOE sponsored checklists were developed as optional resources which assure the minimum documentation requirements of the energy audit is provided in the client file.
- Q. Does the DOE Priority List apply to the DOE annual appropriations contract as well as the DOE Bipartisan Infrastructure Law (BIL) contract?**
- A. Yes. The priority list is allowed to be used with any DOE WAP funding including both annual appropriation and BIL funding.
- Q. Some of the Priority List items contain price caps (e.g., refrigerators). Are the price limits only the maximum charge to DOE or the maximum cost allowable regardless of funding source?**
- A. Any price caps included in the PL are the maximum value that may be charged to DOE WAP. If another funding source will pay any additional amount, the Grantee may administer those funds in accordance with their existing procedures. For additional guidance relating to leveraging of other funding sources, see [WPN 22-9 \(Managing Multiple Funding Streams within the Weatherization Assistance Program\)](#).

Low-Rise Multifamily (LRMF) PL Specific Questions

Q. If a Grantee does not have a current approval for a multifamily energy audit, can they implement the regional priority list for low-rise multifamily dwellings ?

A. WPN 22-8 requires that Grantees provide “written policies and procedures for conducting the energy audits and final inspections for the projects where the PL will be implemented”. If the Grantee does not currently have DOE-approved “written policies and procedures” for the multifamily housing type, they will need to submit these as part of their official request to DOE for review and approval. Alternatively, DOE has provided a sample low-rise multifamily process for adoption by Grantees without existing policies and procedures. Grantees may choose to adopt that process, including all checklist resources, to facilitate the energy audit procedures for its network.

Q. The LRMF PL allows for insulating walls when the “gross area of uninsulated exterior walls is >10% of total exterior wall area. Does this mean 10% of any given wall or 10% of all exterior walls facing the same direction or 10% of all exterior walls?

A. It refers to 10% of all exterior walls, including walls buffered by unconditioned space (e.g., if the total exterior wall area of the building is 1000ft², and more than 100ft² is uninsulated, then the uninsulated portions should be insulated).

Q. Does the LRMF PL require blower door infiltration testing or duct leakage testing in LRMF projects?

A. No. The LRMF PL calls for sealing of leaks in both the building shell and ducts, utilizing a prescriptive approach; however, blower door guided air sealing is still encouraged. The SBSF and MH PLs do require diagnostic testing for leakage, both pre and post work.

Q. What is the difference between WPN 19-4 definition of “small-multifamily” and WPN 22-8 definition of “low-rise multifamily”?

A. WPN 19-4 is focused on the energy audit process which is generally segregated by modeling software capability. Therefore, WPN 19-4 defines small multifamily as 5-24 units per building with individual mechanical systems.

The regional priority lists in WPN 22-8 provides broader applicability based on building height which generally dictates what building codes apply. The low-rise multifamily priority list applies to any buildings contain 5 or more dwelling units per building, 3 stories or less above grade, regardless of the total number of buildings or dwelling units or the design of the mechanical systems (e.g., central vs. individual).