Whole-Building Performance: A Common Sense Energy Approach for Tiny Houses

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The U.S. Department of Energy has requested comments regarding alternative methods for evaluating building energy performance. I encourage DOE to consider a whole-building performance approach for tiny houses as an alternative to relying primarily on prescriptive component requirements.

Tiny houses are fundamentally different from conventional housing. Their compact size, efficient design, and lower overall energy demand provide opportunities to achieve excellent energy performance through a variety of design solutions rather than a one-size-fits-all approach.

A whole-building performance method evaluates the completed home as an integrated system. Rather than focusing on individual components independently, it considers how the building envelope, insulation, windows, doors, air sealing, heating and cooling systems, water heating, ventilation, lighting, and other energy-related features work together to achieve overall energy efficiency.

This approach encourages innovation while preserving affordability. Builders can select the combination of materials, equipment, and technologies that best fit the design of a tiny house while still achieving the desired energy performance. It also allows emerging technologies to compete based on performance rather than compliance with prescriptive requirements.

Because tiny houses already require significantly less energy to heat, cool, and operate than conventional homes, DOE should recognize that evaluating the home as a complete system provides a more meaningful measure of real-world performance.

I encourage DOE to include whole-building performance as one of the alternative methodologies considered for tiny houses and other smaller homes. Evaluating the complete home rather than isolated components can improve consumer choice, encourage innovation, preserve affordability, and continue to support meaningful energy efficiency objectives.