

National Energy Assistance Directors' Association
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February 18, 2010

Dear Secretariat of the Voluntary Carbon Standard,

Please accept the following comments regarding the proposed new methodology "Methodology for Weatherization of Single and Multi-Family Buildings" version 1.0 developed by the Maine State Housing Authority and published on the VCS website on January 14, 2010. These comments are submitted by The National Energy Assistance Directors Association (NEADA). NEADA is the policy and educational organization for program directors who administer the Low Income Home Energy Assistance Program (LIHEAP) in the United States.

LIHEAP provides monetary fuel assistance to low income families in many states within the United States to reduce their home energy costs. A small percentage of LIHEAP dollars is used to help fund low-income weatherization projects that reduce home energy consumption. Any reduction in energy consumption is likely to result in a reduction in home energy costs, and is therefore consistent with LIHEAP's goals. The need for weatherization far exceeds the amount of available funding in the United States, so the potential to create additional funding through the monetization of carbon emission reductions from weatherization is very important.

NEADA supports the newly developed "Methodology for Weatherization of Single and Multi-Family Buildings" for the following reasons:

1. There is not currently a validated methodology to quantify carbon emission reductions from weatherization of residential buildings.
2. The methodology builds on the best practices within the weatherization field by using a whole house approach and including pre- and post-installation audits and other diagnostic tests.
3. A VCS validated methodology will allow for the creation of carbon emission reductions that have the potential to be monetized and enable programs across the United States to leverage federal dollars that are currently available through LIHEAP and Weatherization Assistance Program.
4. Increased weatherization efforts within the low income population will reduce energy consumption, reduce energy costs to the household, and maximize the impact of federal dollars within the LIHEAP program while promoting healthy, comfortable, and affordable housing.

We urge you to work with Maine State Housing Authority to validate this much needed methodology.

Sincerely,



Mark Wolfe
Executive Director