

**Subject:** Regulation Z

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**Name:** Jean B Bluto  
**Affiliation:** Vermont State Housing Authority  
**Category of Affiliation:** Government  
**Address:** 1 Prospect St  
**City:** Montpelier  
**State:** VT  
**Country:** UNITED STATES  
**Zip:** 05602  
**PostalCode:**

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**Comments:**

Energy Efficient Mortgages without any oversight of RESNET and the energy rating business (who are in bed with developers) is a problem. Who does random checks, audits or any supervision of those homes that are rated?????? NO ONE. I know because I have a FOUR STAR ENERGY RATED Home that is NOT. UNFAIR and DECEPTIVE practice, but because the rating agency works closely with the State Finance Agency that was the public partner of a public private partnership (profit was made), and everyone seems to think they are not capable of fraud, no one will LOOK at the complaint. Homeowners are given higher debt to equity ratios, based on fake energy savings thereby qualifying them for a higher mortgage and higher payments based on energy savings that they never get!! They were just given a piece of paper with Four Stars on it, but no test was ever done to verify that the data was correct, and a punch list with work that had to be done to achieve the rating and ASSUMED was done by the builder. Amazing huh? I have the punch list and the letter. Nothing nothing nothing was ever verified, nothing. The rater (used square footage of a MUCH larger home, that larger home would of course use more energy than my home (more expensive to heat) mine is 1000 sq. they used 1382, no insulation was used although a bank disclosure states specific levels of insulation that don't exist, Everyone continues to pretend they are 4 Star rated. It's a great way to get

financing for a more expensive home that one CAN't afford. In other words a scam. The energy rater never did a blower door test and the building is now found to be leaky leaky leaky, pipes freeze and have burst, data they entered (GIGO) saying it's heated space OVER heated space (when 30% of condo is over or next to unheated uninsulated common area that is just like the outside (Frigid Northern Climate.) You are welcome to contact me. I have the calculations, check list where none of the work was ever done that the rater said needed to be done (assumptions) were made that the work was done by the builder. The rater said bags of insulation needed to be placed in empty chimneys (3) but never was. THIS is an old house on National Historic register. It's a shame. Energy rater of my property sits on the Board of RESNET now (having received a LIFE time achievement award) , and Steve Baden the director of RESNET (who was sued by Alaska who won't use RESNET) conveniently can't find the software used to develop my rating. RESNET insists their RAters of the highest standards, what a joke. NREL who did the Pilot Study on Energy Ratings can't find the software either. Isn't that handy. Meanwhile..my heat is going out the windows, the historic building is getting damaged from bursting pipe, and massive ice damming, my mortgage is higher than it should be and I'm COLD and furious that such unfair and deceptive practices CoNTINue...they KEEP selling these as FOUR STAR ENERGY RATED, when THEY KNOW they are NOT. And....this is AFFordable HOUSING, what a joke. I work for a State wide Housing Authority as an HQS Inspector for the Section 8 program. I do have a brain, but I don't have money, otherwise I would sue them. The developer wanted to push through a historic property as affordable housing and couldn't do it without the funding for the affordable housing, AND it had to be energy efficient. So they just MADE it energy efficient on paper and gave people the loans. It's so obvious, when you take one look at the building in winter. In frigid weather, after a snow fall, the heat escaping from the house, melts the snow forming 12-13 foot icicles that weigh about 500 lbs, then they crash onto the historic porch roof and stab it, then the homeowner pays a couple thousand to fix the roof and it happens again and again. Sorry to go on and on. It's so truly outrageous, but without any accountability, the energy rating business becomes a scam, just like any other unregulated business.

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