

April 9, 2012

California Energy Commission  
Attention: Docket No. 12-BSTD-1  
Dockets Office  
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**DOCKET**

**12-BSTD-1**

DATE APR 09 2012

RECD. APR 10 2012

**Re: Comments of the California Energy Efficiency Industry Council on Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 1 and Part 6 (Docket No. 12-BSTD-1)**

To Whom It May Concern:

The California Energy Efficiency Industry Council (Efficiency Council) respectfully submits these comments in support of the proposed California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 1 and Part 6 released as part of the 2013 Building Energy Efficiency Standards Rulemaking Proceeding.

The Efficiency Council is a statewide trade association of non-utility companies that provide energy efficiency services and products in California.<sup>1</sup> Our member businesses, numbering over 65, employ thousands of Californians throughout the state. They include energy service companies, engineering and architecture firms, contractors, implementation and evaluation experts, financing entities, workforce training entities, and manufacturers of energy efficiency products and equipment. The Efficiency Council's mission is to support appropriate energy efficiency policies, programs, and technologies that create sustainable jobs and foster long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

The Energy Commission's Title 24, Part 6 has saved Californians more than \$60 billion dollars over the last 35 years and the 2013 Building Energy Efficiency Standards appropriately advance the code to tap remaining opportunities for cost-effective and substantial reductions in energy use. **The Efficiency Council strongly supports the adoption of the Energy Commission's proposed 2013 building standards** that will save home and business owners an additional \$1.68 billion over 30 years on top of the current standards, avoid the need to construct at least 8 new power plants, and avoid the release of more than 163,000 metric tons of greenhouse gas emissions per year. We believe that the Energy Commission has conducted a fair, transparent, and wide ranging

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<sup>1</sup> More information about the Efficiency Council can be found at [www.energycouncil.org](http://www.energycouncil.org).

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stakeholder engagement process regarding the 2013 updates and has proposed reasonable standards that help put California on track to meet its statewide energy and climate goals and achieve the ultimate goal of zero net energy new construction.

**Energy efficiency remains the most cost-effective and quickest to achieve energy resource.** In addition, energy efficiency offers significant co-benefits that make energy efficiency improvements like those detailed in the Title 24 2013 Updates even more attractive. Our industry also knows that by reducing energy demand and therefore costs, energy efficiency improvements increase home and building values, improve health and comfort of buildings, and decrease greenhouse gas and other emissions, leading to environmental and public health improvements.

The proposed 2013 Building Energy Efficiency Standards provide great opportunities to encourage cost-effective energy efficiency improvements in California buildings. The Efficiency Council appreciates the opportunity to offer comments on the proposed revisions to Title 24, Part 6. We look forward to working with the Energy Commission and other stakeholders to ensure continued energy savings in California.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Schiller', with a long horizontal line extending to the right.

Steven R. Schiller  
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