

## DOCKETED

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## **Comments of ACCA - The Indoor Environment & Energy Efficiency Association to the California Energy Commission Existing Buildings Energy Efficiency Draft Action Plan and the April 7, 2015 Kickoff Workshop**

The following comments reflect the views of ACCA - The Indoor Environment & Energy Efficiency Association to the California Energy Commission Existing Buildings Energy Efficiency Draft Action Plan and the April 7, 2015 Kickoff Workshop.

One key concept was repeated several times during the workshop – simplification of the code and the permitting process is critical to improving the rate of compliance. Underlying this issue is the complexity and conflicts within the code, the administrative burdens of compliance, misunderstanding over how the code applies with regard to new construction and existing buildings, perceptions that code enforcement officials don't understand the code or can't meet their workload due to a lack of resources, and a fear that one type of permitted work will trigger other mandatory upgrades.

The potential solutions outlined at Sections 1.5.1-1.5.7 are appropriate measures to be considered as possible solutions to address these problems.

Improvement 1.5.8 Serial Number Tracking is listed as a final option with a long term implementation date and was referenced as a "last resort" during the workshop. However, HVAC equipment serial number tracking is unlikely to result in increased code compliance. Serial number tracking would take significant resources to administer and enforce, and would likely be vulnerable to data entry errors and enforcement difficulties.

The state of California is to be commended for setting ambitious goals for carbon emissions and energy efficiency that include innovative practices and the use of advanced technologies. The potential solutions presented in the Action Plan Sections 1.5.1-1.5.7, if given sufficient resources and time, can close the Title 24 compliance gap.