

## DOCKETED

<b>Docket Number:</b>	15-IEPR-05
<b>Project Title:</b>	Energy Efficiency
<b>TN #:</b>	205691
<b>Document Title:</b>	Ted Atwood Comments: trakrefÂ® Comments on CEC's Existing Building Efficiency Action Plan draft
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Ted Atwood
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/11/2015 5:19:01 PM
<b>Docketed Date:</b>	8/11/2015

*Comment Received From: Ted Atwood*

*Submitted On: 8/11/2015*

*Docket Number: 15-IEPR-05*

**trakref® Comments on CEC's Existing Building Efficiency Action Plan draft**

*Additional submitted attachment is included below.*

April 21, 2015

California Energy Commission

Comprehensive Energy Efficiency Program for Existing Buildings

Docket # 15-IEPR-05

Re: Existing Buildings Energy Efficiency Action Plan - Draft

## Comprehensive Energy Efficiency Program Leaps Forward

California's Assembly Bill 758 (AB758) represents a great leap forward in the integration of stakeholders impacted by commercial building-related energy efficiencies, management, ownership and maintenance. For property owner/operators, HVAC service contractors, refrigerant gas distributors and reclaimers, it's another step down the road toward open collaboration, providing necessary clarity about the installation, use and conveyance of high-energy-consuming equipment.

At trakref®, we've been invested in making optimal management of HVAC/R equipment and assets easy from day one, guaranteeing full compliance for every client. As a software and service company, we provide compliance assurance through our unique digital tools for property owners, wholesale suppliers, OEM providers, tenants and property managers. Trakref® is committed to deliver the most user-friendly tool on the market to create engagement between technicians, equipment providers, property owners and managers to ensure system longevity and operational excellence through an optimal combination of communication, benchmarking, asset management and compliance. With trakref®, it's all in there.

With the debut of AB758, California sends a signal, reinforcing the vital nature of trakref®'s commitment to help businesses maximize the value of their HVAC/R investments the right way, opening collaborative conduits for communication via our unique digital platform aimed at efficient sustainably.

Much like California's AB32 and AB1103 regulations, AB758's framework is built around a leading-edge guidance document that clarifies and articulates value to consumers, business owners and managers. Property owners are often absent from the properties they own and rent, communicating with tenants through designated property management companies, so lines of communication are rarely direct and can often be unreliable or even faulty. Technology and hardware installed in owner-absent buildings can sometimes have a negative impact on the tenant, who may inherit an expensive energy legacy. Put simply, obsolete HVAC/R equipment increases tenant energy costs.

As the HVAC industry struggles with high employee turnover, the knowledge base for optimal service and maintenance of installed equipment shrinks accordingly. The tagging strategy proposed in AB758 (sections 1.6.5 and 1.6.8) could go a long way toward mitigating this substantial challenge to efficiencies. Technicians servicing units today have a detailed awareness of a system's health and performance characteristics, but once they leave a job or join a service provider, all too often their accrued knowledge about the history and specifics regarding each particular unit disappears with the individual.

However, hope is alive and well in California. The guidance in these sections of AB758 offers a plan for smooth transition between service providers, as well as between potential property owners and tenants.

There is plenty of opportunity at multiple points of contact throughout the HVAC/R industry to increase and improve communication, a simple yet crucial concept and the baseline bedrock of trakref®'s entire platform.

Technologies suggested for tagging and serializing (like those in AB758, section 1.6.8) have a history of effectiveness in automobiles. The data already exist (in a static form) on each piece of equipment, and the digital tracking component already exists in the marketplace. Millions of items are already being managed this way. Forward-looking, progressive technologies used on a massive scale, such as the suggestion of plug-load segmentation (as outlined in AB758, section 1.6.5) are already employed and active today. Those deployed on an extensive commercial scale and others being piloted for future implementation provide low-cost means to accomplish these shared goals.

We at trakref® commend the California Energy Commission on a well-written draft and remain confident not only that the technologies designed to accomplish all the goals defined in the document exist today, but also that they are poised and ready for implementation. AB758 should be a reference for all government and non-government entities attempting to make sense of energy management.

Beyond the inevitable energy and capital savings resulting from tenant bill reductions, the longevity and value of related equipment can be expected to augment accordingly. Energy consumption would thus become the most significant indicator of system health and efficiency. Aligning industry goals of energy efficiency and sustainability with the benefits of increased profitability through optimal tracking and management of HVAC and refrigerant gas assets should provide additional incentives to get more conscientious businesses on board.

Fixed asset records for commercial real estate can be inconsistent and incorrect, but AB758 provides effective ground rules for the manner in which assets should be defined and classified, and when and how that designation should take place. These long-term changes should benefit all sectors of the market, including field service technicians, as the data will act as an objective source of collaboration regarding condition and thus offer benefits to all stakeholders, saving time and money, and alleviating performance concerns, resulting in happy tenants, satisfied customers, more successful businesses and a healthier environment.

At trakref®, we're creating elegant and responsible solutions that empower industries to evolve. We look forward to supporting AB758 and participating in California's ongoing, progressive leadership into the future.

Should you have any questions regarding this perspective, please contact us at (888) 834 - 0233, or via email at [tatwood@trakref.com](mailto:tatwood@trakref.com).

Sincerely,

Ted Atwood

CEO, trakref®