

DOCKETED

Docket Number:	15-OIR-05
Project Title:	Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802
TN #:	206683
Document Title:	California Building Industry Association Comments: Support for AB 802 & Order Instituting a Rulemaking
Description:	N/A
Filer:	System
Organization:	California Building Industry Association/Robert Raymer
Submitter Role:	Public
Submission Date:	11/19/2015 8:43:22 AM
Docketed Date:	11/19/2015

Comment Received From: Robert Raymer

Submitted On: 11/19/2015

Docket Number: 15-OIR-05

CBIA Support for AB 802 & CEC OIR 15-OIR-05

Additional submitted attachment is included below.



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Industry Association

November 18, 2015

Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: **CBIA Support for AB 802 and the Order Instituting a Rulemaking:
Building Energy Use Disclosure and Public Benchmarking Program**

Dear Commissioner McAllister,

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light-commercial construction. Please be advised of CBIA's strong support for the opening of an Order Instituting Rulemaking (OIR) to respond to the requirements of AB 802 (Williams).

Legislation passed in 2007, AB 1103 (Saldana), was the first successful legislative effort to establish a benchmarking program for non-residential buildings, focusing primarily on disclosure of the energy consumption data of these buildings. This information can and will play a key role in the decision-making process of potential tenants and buyers of these buildings. However, as the CEC sought to implement regulations establishing the program required by AB 1103, over time, it became clear that there were serious field-application issues associated with the initial legislation. Implementation was being severely hampered by confusion in the field and the inability of the interested parties to obtain utility consumption data in a consistent and timely manner.

In 2015, Assembly Member Das Williams sought to address these and other related issues by authoring AB 802. By the end of the legislative session, AB 802 was supported by broad coalition of over two dozen different groups including the residential and commercial building industries, labor, the environmental community and the investor owned utilities. It goes without saying that this level of broad-based support is very rare in Capitol politics and it is a testament to Assembly Member William's patience and leadership that this measure made it to the Governor's desk and was signed into law.

In response to the AB 802 mandate, the CEC has taken action by approving an Order Instituting Rulemaking (15-OIR-05). The work done on the implementation of AB 802 will serve as an integral part in achieving the overall goals and objectives of AB 758 and SB 350. CBIA strongly supports this action and looks forward to working with you and the CEC staff on this administrative proceeding. Your leadership and ability to promote consensus among interested parties will serve the State of California well as this process moves forward.

Sincerely,

Robert E. Raymer, PE
Senior Engineer/Technical Director