

DOCKETED

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COMMENTS OF THE BUILDING PERFORMANCE INSTITUTE, INC.

Please attached document

Additional submitted attachment is included below.



Building
Performance
Institute, Inc.



**COMMENTS OF THE BUILDING PERFORMANCE INSTITUTE, INC.
ON DRAFT 2016 EXISTING BUILDINGS ENERGY EFFICIENCY ACTION PLAN**

November 1, 2016

Larry Zarker

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INTRODUCTION

Building Performance Institute, Inc. (BPI) respectfully submits these comments filed on November 1, 2016, regarding the draft 2016 Existing Buildings Energy Efficiency Action Plan.

BPI is the nation's premier building performance credentialing, quality assurance and standards setting organization¹. BPI develops technical standards using an open, transparent, consensus-based process built on sound building science. BPI is approved by the American National Standards Institute, Inc. (ANSI) as an accredited developer of American National Standards and as a national certifying body. BPI offers the following:

- national standards to ensure top quality, consistent protocols are being followed throughout the home performance and weatherization workforce;
- certification of individuals in building analyst, heating, air conditioning/heat pump, shell/envelope, multi-family, and manufactured housing designations;
- implementation of the BPI GoldStar Contractor Program for contracting companies committed to delivering quality home performance improvements;
- quality assurance to verify conformance with BPI Standards and provide feedback for continuing improvement;
- partnerships with testing organizations that deliver BPI services in their market

Numerous programs across the U.S. rely on BPI GoldStar Contractors, BPI Standards and Professional Credentials as the foundation of their energy efficiency, carbon reduction, and weatherization activities. BPI represents home energy professionals holding more than 24,000 certifications nationwide, with more than 800 individuals holding nearly 1,200 certifications in California (individuals may hold more than one professional certification). Nationwide, more than 3,000 companies employ BPI certified staff with many of those companies throughout the state of California. They include general and specialty contractors, home performance contractors, HVAC and insulation contractors, auditors, raters, energy service companies, utility staff, engineering and architecture firms, implementation and evaluation experts, workforce training entities, and distributors of energy efficiency products and equipment. BPI's motto is raising the bar in performance contracting.

Standards - Certifications – Rating System – BPI GoldStar Contractors

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BPI commends the Commission on its continued commitment to existing building energy efficiency and looks forward to working together in the future in the betterment of the ratepayers of California.

Comments

Vision and Goals Framework

BPI believes providing contracting companies completing work under Energy Efficiency Programs should be provided much needed support in Quality Management System (QMS) integration into their daily business practices as an integral part of the vision and goals framework. The BPI GoldStar Contractor Program provides QMS training and other resources such as templates, spreadsheets, and policy and procedures guidelines at no fee to contractors participating in the program. Properly executed QMS practices will facilitate workforce training and education, consumer protection and overall program excellence.

Strategy 1.4 Uniform Energy Asset Ratings to Compare Building Properties

Residential Building Energy Asset Ratings

BPI is unclear on the Commission's rationale to develop an existing home rating method different than the US DOE Home Energy Score (HES). Nearly 50,000 Scores have been completed to date, many by Home Energy Score Partners in the private market. It is incumbent for the Commission to point to initiatives and resources already established and fully functional in the market. The DOE HES could be adopted immediately in CA and doing so would save CA ratepayers time and money.

Strategy 2.1 Modern, Accessible Data

Data Exchange Protocols

BPI strongly suggests that the CEC point to accepted industry standards BPI-2200-S-2013 Standard for Home Performance-Related Data Collection and BPI-2100-S-2013 Standard for Home Performance-Related Data Transfer as the protocols for data collection and transfer for all CA utilities. These HP-XML standards are becoming the protocols of the nation's larger whole-house programs and have strong support from the US Department of Energy (DOE), National Renewable Energy Laboratory, the Home Performance Coalition and integrates completely with the DOE Building Energy Data Exchange Specification.

Strategy 3.3 Energy Efficiency Workforce Alignment

BPI strongly suggests the Plan to include the BPI Healthy Home Evaluator (HHE) certification to prepare the industry for future integration of a higher-level health and safety assessment in residential homes. The HHE certification was developed to help individuals conducting assessments in homes to determine conditions that may adversely affect occupant health and safety. Having either the BPI Building Analyst, Energy Auditor and Quality Control Inspector certification as prerequisites demonstrates the integrity of the credential.

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Goal 5. Affordable and Accessible Energy Efficiency Solutions

Cap and Trade Funds

The plan should allow Energy Efficiency Program Administrators the ability to allocate a percentage of Cap and Trade funds to address health and safety issues within existing lower income households. These funds could be used to complete the installation of measures that mitigate issues leading to poor indoor air quality, mold, Asthma triggers and other Health and Safety issues not eligible under other funding streams.

Respectfully submitted,

By:



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November 1, 2016

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