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On 2019 Building Energy Efficiency Standards PreRulemaking (Part 1 of 2)

Additional submitted attachment is included below.

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Sent: Friday, December 15, 2017 3:57 PM

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Subject: 2019 Building Energy Efficiency Standards PreRulemaking, 17-BSTD-01, Comments on

Section 120.8

Attachments: Building Commissioning Association Comments to Title 24 Section 120.8.pdf

Follow Up Flag: Follow up Flag Status: Flagged

The California Chapter of the Building Commissioning Association (CA-BCA) is thankful for the opportunity to provide comments on Title 24-2019 Section 120.8 (Commissioning).

Over the past code cycle, we have been dismayed to see modifications that have not only watered down the qualifications for who can provide commissioning services, but also the objective viewpoint required to provide truly independent input to this quality process. For the 2019 code, significant effort was put into soliciting feedback for changes to sections 110 (mechanical) and 130 (lighting), but there was little outreach to the commissioning community for changes to section 120.8.

As a result, the CA-BCA is making the effort to speak on behalf of the leadership, our members and the commissioning community at large. We, the CA-BCA governing board, request that CEC carefully evaluate the arguments and proposed changes in the attached letter as it works to finalize Title 24-2019.

We appreciate the opportunity to provide feedback in this rulemaking process.

Lyn

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