

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	222547
Document Title:	CalCERTS, Inc. Comments 2019 45-day draft language Section 150.0(c)14 and Joint Appendix JA11
Description:	N/A
Filer:	System
Organization:	CalCERTS, Inc.
Submitter Role:	Public
Submission Date:	2/14/2018 1:03:28 PM
Docketed Date:	2/14/2018

Comment Received From: CalCERTS, Inc.

Submitted On: 2/14/2018

Docket Number: 17-BSTD-02

2019 45-day draft language Section 150.0(c)14 and Joint Appendix JA11

Additional submitted attachment is included below.

February 14, 2018

To: California Energy Resources Conservation and Development Commission

Docket # 17-BSTD-02

RE: 2019 45-day draft language Section 150.1(c)14 and Joint Appendix JA11 – Verification of Solar PV panels

California's Energy Code is an important part of California's leadership in Resource Conservation. Because it has long been realized that local building departments do not have the time nor resources to fully verify every energy feature, California instituted third party special inspections by HERS Raters to ensure compliance with the code. For energy features not delegated to HERS Raters, enforcement relies heavily on being inspected by the local building inspector, who, as we know are already overburdened.

Given this knowledge, we should take more of the responsibility off of the backs of code enforcement personnel and rely more on the HERS Raters who are specifically trained and certified to perform the complex and time consuming field verification of energy features. Given that a HERS rater is already required on every newly constructed home, the cost to add more inspections is relatively small compared to the benefit of ensuring the cost savings sought by the energy feature installed.

We were very surprised to find out that even though the CASE study for Rooftop Solar PV Systems very specifically called for third party HERS verification of PV systems, the 45 day code language EXCLUDES it. We understand that PV Systems are checked by the utilities and will have monitoring systems on them – however there are serious limitations to these checks.

Joint Appendix JA11 is the new verification protocols for PV systems. As written it REMOVES HERS Verifications and adds even more responsibility on the backs of code enforcement personnel as follows: *"The local enforcement agency shall verify that all Certificates of Installation are valid and that the PV systems meet all provisions of JA11."*

Not only is this going in the wrong direction by making enforcement more burdensome on building departments, it raises serious procedural issues. This substantive change to the CASE study recommendation was made without notification, consultation, or even explanation since

it was not mentioned anywhere in the Initial Statement of Reasons. In our previously docketed comments, dated July 27, 2017, we specifically requested to be involved in the development of any verification protocols. We were not made aware of this change and it has since come to our attention that CALBO was not consulted either. Our many discussions with Building Officials makes us believe that they would also be in favor of HERS verification of PV panels, rather than relying on building inspectors.

Many HERS Raters are already trained and certified to perform PV Verifications and have been doing so for years with the NSHP program. It is our hope that Commission staff will involve the HERS providers and raters and reconsider the exclusion of HERS verification of this extremely important energy feature. PV is integral to California's Energy goals -- ensuring proper installation of PV with a HERS Verification ensures that these goals are actually realized and not just "on paper".

Thank you for this opportunity to comment on the 2019 code. We look forward to the Commission's feedback on this issue.

Sincerely,



Russell King, M.E.
Senior Director of Technical Services,
CalCERTS, Inc.