

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222779
<b>Document Title:</b>	The Energy California Comments HERS Verifications for Solar
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	The Energy California/Kyle Kilby
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/28/2018 2:47:38 PM
<b>Docketed Date:</b>	2/28/2018

*Comment Received From: Kyle Kilby*

*Submitted On: 2/28/2018*

*Docket Number: 17-BSTD-02*

## **HERS Verifications for Solar**

*Additional submitted attachment is included below.*

February 28, 2018

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: Docket #17-BSTD-02

Since 2010, I have provided energy efficiency ratings and participated in home upgrade programs. I have worked in all areas of California, but especially in the Central Valley and Bay Area. Since joining Energygy, I have worked directly with HVAC and retrofit contractors to provide high-quality HERS inspections and streamline the process for Title 24 and other energy assessment programs.

I fully support California's ambitious energy code. HERS Raters provide a necessary and critical role in achieving the code's anticipated energy savings. HERS Raters provide an independent verification of compliance. In that context, I believe the updated Standards should extend those verification requirements to solar photovoltaic systems and batteries.

Like prior Standard increases to envelope and HVAC systems, the proposed rules regarding solar and batteries will have a substantial impact on compliance. Without verification, there is increased chance lost savings due to improper installation.

I am grateful for the opportunity to comment on this issue. Third party verification of installed solar systems is vital achieving the savings of the proposed Standards.

Respectfully,

A handwritten signature in black ink that reads "Kyle Kilby". The signature is written in a cursive, flowing style with a long, sweeping underline that extends to the right.

Kyle Kilby  
Area Manager, The Energygy California