

DOCKETED

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I wish it went further

I am the CEO for an engineering company headquartered in San Francisco, California. I have been designing healthcare facilities for 30 years. 80% of the work of my firm is the design, construction, and operation of engineered systems for healthcare facilities. Through the years, I have served on the national electrical code, the healthcare code (NFPA 99), the Facility Guidelines Institute, ASHRAE, the California Hospital Safety Board, and many other policy bodies in the healthcare energy space.

I have reviewed the proposed changes from the California Energy Commission to require California hospitals to comply with certain elements of California Title 24 Energy Requirement.

In my opinion, the CEC's proposals do not go far enough. The US Department of Energy requires every state to pass regulations equivalent to ASHRAE 90.1, the most recently certified edition. The CEC proposals fall well short of this mark.

In my view, we have a state government that is justly proud of its leadership in the environmental sphere. We have breathtakingly difficult goals for reducing our state's carbon footprint. I think achieving this goals is vital to the future. I also think we cannot pretend we are a leader when we are taking steps that are not even compliant with Federal Regulation.

Having said that, i well understand that the state of Calfronia has, through administrative accident, failed to regulate hospitals' energy consumption for decades, thus accustoming this industry to being able to ignore the regulations. I understand the concern for easing into a new regulatory regime. I accept the judgment of the CEC and OSHPD that the proposed set of regulations is the best path forward, given the historical circumstances. I am not happy about it, and i think it falls well short of the law, and well short of the way we Californians like to think of ourselves, but if it is the necessary first step, then i support it.

I hold the people from the CEC and OSHPD in the highest regard. I have watched their efforts for many years, to balance the various competing needs of the citizens of this state. I am well aware that my views are more like those of Governor Brown than, maybe, some other of my fellow citizens, and it is in that spirit, the spirit of compromise, of finding workable solutions, that I endorse the proposed changes.

Thank you CEC and OSHPD.