

## DOCKETED

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**2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking**

*Additional submitted attachment is included below.*



# Comments on Docket #17-BSTD-01

March 5, 2018

To: California Energy Resources Conservation and Development Commission

Re: 2019 45-day draft language Section 150.1(c)14 and Joint Appendix JA11 – Verification of Solar PV panels  
Docket # 17-BSTD-02

As HERS Rater I have found providing independent third-party verifications safeguards the public from installers who would have otherwise foregone adhering to Title 24 energy compliance protocols. If it is not needed, they will not do it. If there's no one looking over their shoulder so to speak, e.g. HERS Rater, they will not do it. It's not that they are incompetent or unscrupulous contractors or installers, it's about time and money. If they do not have to waste the time and money to address an issue or can pass a system that would not pass, without impunity, they will. Third-party verifications keep installers honest pure and simple.

This says nothing about the already overburdened and overworked staff of the local building departments. Building departments have come to rely on HERS Raters to insure the energy codes are being properly addressed during the build cycle. PV is an intricate component of our ZNE goals and we need to insure they are both installed and working properly. The local building departments will need to rely on installers to pass their own work. The idiom, "the fox guarding the hen house" comes to mind.

Solar is a secondary component to getting to ZNE. The primary component is becoming energy efficient. Reducing energy use allows for a smaller solar system and more easily produces a ZNE building that will remain so for years to come. We know an energy efficient home will operate within temperature ranges that allow solar to more accurately reduce any remaining energy use. If we are serious about reaching out ZNE 2020 goals, we need buildings that use the least amount of energy necessary and a properly sized and working PV system. If we are not having third party verifications for PV than we will be right back here discussing this in the next code cycle or two when we realize we will not meet our goal of ZNE by 2020. A task easy enough to achieve.

Having a HERS Rater verify the energy efficiency measures, but ignores the PV measures, simply makes no sense. It's like buying new car tires, requiring proper air be in the tires, but ignoring the tightness of the lug nuts, and then later wondering why the new tires aren't working out so well.

I would strongly recommend Commission staff reconsider third party verification for PV measures installed.

I would also encourage Commission staff to identify alternate paths a HERS Rater can take to confirm compliance. Commission has in the past used the HERS registries as a portal for submission of compliance documents. This should have been an issue. Sadly, it has created conflicts within the HERS Rater community. While the vast majority



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of HERS Raters work well together without question, there are those who become territorial with their projects in the registry and will not share the project with another HERS Rater in a misguided attempt to extract ransom from other HERS Raters, to the detriment of the homeowner. An alternate path would alleviate this problem.

Thank you for this opportunity to comment on the 2019 code.

Sincerely,

Mark Stout  
President  
Apollo Energies, Inc.