

## DOCKETED

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## **On Proposed Modifications to the 2019 Standards**

*Additional submitted attachment is included below.*



March 5, 2018

TO: California Energy Commission - Docket No. 17-BSTD-02  
RE: Proposed modifications to the 2019 Standards

The CALBO Energy Advisory Committee has committed to working with the California Energy Commission staff to help simplify the Building Energy Efficiency Standards and increase the usability of the documents.

CALBO would like to go on record to support three main areas of improvement to the Standards.

- Reinstate the index
- Reformat the code to be consistent with the other parts of Title-24
- Eliminate forms that have minimal value, specifically the installation forms

CALBO feels that simplification of the Standards including reinstatement of the index and reformatting of the Standards coupled with elimination of forms that are of minimal value would help to increase acceptance and compliance.

In addition, CALBO is taking this opportunity to express concerns regarding the new requirement in Section 150.1(c) 14, for the local jurisdiction to verify the performance of code required photovoltaic systems. It is unrealistic to expect building inspectors to take the time necessary to verify azimuth range as well as existing and future shading of buildings, trees, utility poles and other obstructions. It is just as unrealistic to expect building inspectors to utilize an online satellite mapping tool to verify compliance. Building inspectors and plans examiners are often criticized for not spending the time considered necessary to verify compliance. This requirement, as written, is not a viable option and would only serve to open inspectors to additional criticism. This is not our area of expertise and we have a very limited amount of time to spend verifying compliance with all of the parts of Title 24.

We understand that the CEC is working on reinstating an index to assist code users in navigating the Standards.

We understand that formatting the Standards to be consistent with the other parts of Title 24 is not an option for the 2019 Standards however; CALBO would like to express support of that effort for the 2022 Standards. We believe that this effort would increase compliance without modifying the requirements of the Standards. It could also reduce the amount of training necessary to adequately understand and utilize the Standards.

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The third suggestion for improvement of code compliance is to eliminate forms that have little demonstrated value. I am specifically referring to the installation forms. There is no other code that Building Departments enforce that require the contractor to state that they have complied with the approved plans and code.

The Standards require the contractor to affirm that they have constructed the building in compliance with the code and the approved plans. This additional step includes the CF2R installation forms. For the inspector to provide a meaningful review of the CF2R forms he/she must review all of the required measures to ensure that all of the required CF2R forms have been completed. Then the inspector compares the CF2R forms to the CF1R forms. At this point in the inspection we are not even inspecting the work, we are inspecting forms to ensure that they align with the submitted forms. This is time spent that does not contribute to compliance or verification of compliance; it is simply verifying that one set of forms matches another set of forms.

The Energy Commission staff has made great strides to improve the prescriptive forms by eliminating unnecessary information and providing dynamic formatting. CALBO is appreciative of the efforts to reinstate a meaningful index. We look forward to further collaboration with the Commission to continue to improve the Standards and process. The CALBO Energy Committee urges the Energy Commission to reconsider the requirement that charges building inspectors with verification of PV system performance.

Sincerely,



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