

DOCKETED

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Comment Received From: Benjamin W. White

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Provide full and accurate cost and energy information for all proposed measures

Thank you for the opportunity to submit comments on the proposed 2019 updates to the California Building Code. These comments address several aspects of the proposed updates from the perspective of maximizing greenhouse gas emissions reductions at the lowest possible cost.

1. Several CASE Reports (Residential Compact Hot Water Distribution, Residential Indoor Air Quality, Residential Drain Water Heat Recovery) leave out important metrics such as Estimated Statewide First Year Energy and Water Savings, and First-Year Statewide Energy and Energy Cost Impacts. Residential Indoor Air Quality CASE report directs readers to see “other reports addressing ventilation rates”. As all of the proposed measures are specific to this update, please provide the missing data to allow the public to evaluate the effects of the proposed code revisions in their entirety. As provided in the CASE reports, the information is insufficient to allow an analysis of the overall impacts of the combined proposed measures.

2. The costs identified in CASE reports for each measure differ from costs provided by building industry consultants for each measure. Trade organizations such as the California Building Industry Association have gathered detailed cost information from their members (representing over 80% of large homebuilders in California), equipment manufacturers, and other stakeholders that is more detailed than the values presented in the CASE reports, which in some cases are over a year old. In some cases, the costs provided by industry would result in the benefit / cost ratio of certain measures to be less than one. The costs that CEC uses to test for cost-effectiveness may be accurate but there has been no supporting information provided to the public to allow us to determine this. Please provide supporting documentation for the costs identified in the CASE reports to allow the public to determine if the costs used in the benefit-cost analysis are accurate and how they are representative of the costs faced by builders in 2020.

3. Please provide data files used to determine TDV savings in the CASE reports upon which the proposed 2019 revisions are based. There is no way for the public or researchers to validate the CEC’s referenced TDV savings or greenhouse gas emissions reductions without these data files.

4. In light of the postponement of the March 21 Hearing for Consideration and Possible Adoption to adopt the proposed revisions, please update the costs, benefits, statewide impacts, and first-year energy impacts associated with changes to CASE reports requested in Staff Supplements. For example, the Residential Indoor Air Quality measure which has significant staff comments (Staff Supplement to CASE Report #2019-RES-IAQ-F) that will impact energy and cost impacts of the proposed measure. This updated information for this and other reports that are revised by Staff Supplemental comments should be made available to the public, with sufficient time allowed for the public to analyze the impacts and provide comment prior to code adoption.