



DOCKET	
10-BSTD-01	
DATE	JAN 27 2012
RECD.	JAN 30 2012

January 27, 2011
To: California Energy Commission
From: Bill Soest, Evergreen
Subject: Proposed Changes to RA 3

I am a CalCERTS certified HERS rater (CC2005477) with a small business conducting HERS ratings and inspections. I question the rationale and language currently proposed for the 2011 Residential Appendices RA 3. Specifically, Sections RA 3.3.2.1.2 *Powered flow capture hood*, and RA 3.3.3.1.3, *Diagnostic System Airflow Using Powered Flow Capture Hood*.

There are two reasons for objecting to these proposed changes. First is the cost involved for purchasing new test equipment. My small business incurred the cost to purchase an accurate TSI Alnor Balometer with an accuracy range of +/- 3% when reading air flows from 50-2000 CFM. This unit and the accessories for performing wet bulb/dry measurements cost approximately \$2,900.00. Is another 1% of airflow measurement accuracy truly necessary when using a Powered flow capture hood? The cost involved to replace this new unit with a Powered flow capture hood is not economically feasible given the accuracy of the Alnor flow hood.

The second reason involves the cost increase to my customers, the homeowner/consumer. One of our goals as HERS raters and verifiers is to provide consumer protection; we verify the HVAC contractor provided the equipment with the specified performance. Please do not make this unnecessary change to the RA's; this increased cost is not worth the miniscule increase in accuracy.

Thank you for your time and consideration in this matter
Sincerely,

William E Soest
President Evergreen Technologies
Local Effort, Global Impact