

DOCKETED

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Comment on Residential Alternative Calculation Method for VCHP

The presentation includes a specific requirement that I will argue is redundant with current code requirements.

On slide 27 (referencing slide 14)

"Each habitable room must be directly served by ducted air handler or ductless head. "Transfer fans do not meet this requirement"

The installed conditions referenced in slide 14 clearly do not meet current code requirements in CRC 303.9 (and CBC 1204.1), and therefore are not a reasonable basis for additional policy for the purposes of this credit.