

DOCKETED

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HRV's Software update

Additional submitted attachment is included below.



May 4, 2021

Dear Commissioners and Staff,

Harris & Sloan is a multi-discipline consultant working with most national, regional, and local low-rise residential builders throughout the state, many of whom are facing similar challenges.

The following comment is in response to the recent posting regarding the revision to the 2019 Nonresidential and Residential ACM Reference Manuals. We would like to comment specifically on measures taken to the software related to Heat Recovery Ventilators (HRVs).

We appreciate the measures taken by staff to identify issues related to the lifetime operation and efficacy of HRVs. We understand the conclusion that HRVs are currently receiving a disproportionately large compliance credit given maintenance concerns across the lifespan of the HRV. Given those concerns we believe the effort to neutralize this unforeseen credit within the CBECC software is a logical next step.

However, we would like to ensure the commissioners and staff are aware of the current state of the construction industry and advise the commission to account for this in setting a date of release for the revised CBECC software. Over the past year, the industry has experienced record increases in material costs and material shortages due to rising demand and reduced material / labor from the pandemic. More recently, the freeze in Texas this February has led to severe shortages for numerous building materials which depend on the raw materials produced there. At present, lumber costs are 300% over previous years and material shortages in insulation, appliances, HVAC equipment and various foam products are driving up the prices of those components. All of this has led to persistently increasing prices for the consumer.

When the California Energy Commission first identified the issues with HRV compliance credit at the end of 2019, the cost analysis for compliance measures was very different from what it is today. High Performance Attics could be installed for a cost similar to an HRV with materials readily available from distributors. Today, insulation manufacturers have halted production of 24" batts and contractors aren't willing to put their laborers up in high attics to net trusses. Given these current constraints, HRVs are one of the few solutions to meeting energy code requirements in many areas of California.

In today's building environment, the proposed changes to the 2019 software pose a hardship to the buyer and remove a key credit that would make compliance cost prohibitive. This has the potential to halt construction in a market that is already producing new units at rates lower than necessary. Consequently, changes to the code should not be implemented until the market has normalized. We recommend that measures taken to adjust software be postponed to the adoption of the 2022 Title 24 part 6 Energy code.

Respectfully,

Harris & Sloan

Shawn Mayer