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Comment

Additional submitted attachment is included below.



November 22, 2022

Energy Commission Docket 22-BSTD-01 "2025 Energy Code Accounting"
docket@energy.ca.gov

To whom it may concern:

In this workshop, it was brought up that the 2025 compliance measurement is being proposed to change from Time Dependent Valuation (TDV) with a kBtu metric to Systemwide Life Cycle Cost (SLCC) with a dollar cost (\$) metric.

While I understand that many people feel that the public does not understand what TDV really represents in terms of Energy Code compliance, I do not think changing to SLCC with a dollar cost (\$) metric will help at all. "Life-cycle cost" is already used by the industry to represent projected life-cycle costs of a project design. I feel that people will not understand the nuance of "systemwide" and that the SLCC does not represent their specific project's cost analysis. Here is a good example of how the term "life-cycle cost" is understood by our industry https://en.wikipedia.org/wiki/Life-cycle_cost_analysis.

Additionally, I feel that by using dollar cost (\$) as a metric, further confusion will prevail about what that "\$" means. In our industry we already use this metric to support life-cycle cost analysis, monthly and yearly utility billing projections and LEED rating. Please don't add another use that doesn't support the understanding the industry already has of this metric.

When signing a Certificate of Compliance document as either the "Documentation Author" or the "Responsible Person", we are asserting our knowledge that the project, as represented with the compliance form, is equal to or better than what is represented within the design documents and in the physical building as approved with a final occupancy permit. These documents are provided to the Building Owner to support who is liable for the building design meeting the applicable Energy Code. When compliance is measured with dollars, there could very well be confusion on the part of the Building Owner when they see that the utility costs in their energy bills do not match, or support, the values represented in the Certificate of Compliance. My concern is the added liability I take in signing and taking responsibility for an assumed cost metric that does not support the actual utility costs the Building Owner sees on their utility bills.

Please reconsider changing TDV to SLCC, and kBtu to \$.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gina Rodda', written in a cursive style.

Gina Rodda

Principal

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