

DOCKETED

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*Comment Received From: Harris & Sloan Consulting Engineers, Inc.
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**Harris & Sloan comment on 2025 Energy Code Pre-Rulemaking
Express Terms**

Additional submitted attachment is included below.



November 17, 2023

California Energy Commission
Docket No. 22-BSTD-01
715 P Street Sacramento, CA 95814
docket@energy.ca.gov

RE: Draft 2025 Energy Code Express Terms

California Energy Commission Commissioners and Staff:

Harris & Sloan appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft 2025 Energy Code Express Terms (Express Terms) docketed November 3rd, 2023.

Harris & Sloan supports the commissions efforts to further, and better, define the administrative procedures of the ECC program outlined in section 10-103.3 of the draft terms and as such we are asking that the CEC revise subsection 10-103.3(b)1Aii to clarify that the intent of including "designer" is meant to restrict ECC-Providers, ECC-Raters, and ECC-Rater Companies from acting as signatory authority (i.e "Responsible Designer") thus eliminating any conflict of interest. Furthermore, we would like to clarify it is not the intent of the CEC to state that ECC-Rater Companies completing energy designs as "Document Author" is a conflict of interest.

Proposed modifications to 10-103.3(b)1Aii:

(b) General Provisions.

1. Conflicts of Interest.

A. Prohibition of Conflicts of Interest.

- i. ECC-Providers shall be independent from, and have no financial interest in, ECC-Rater Companies or ECC-Raters.
- ii. ECC-Providers, ECC-Raters, and ECC-Rater Companies shall be independent from, and have no financial interest in, the builder, ~~designer~~ responsible designer company listed in the Certificate of Compliance, or subcontractor installer of energy efficiency installations field verified or diagnostically tested.

Harris & Sloan does not believe it is the CEC's intent to change the business model of the ECC Program or ECC-Rater Companies that provide energy design, and other engineering design work, for the home building industry; rather to clarify where conflicts of interest may not occur. We believe these clarifications will go a long way toward building a better ECC Program that is in the best interest of homeowners, and ultimately continue pushing toward building more energy efficient and affordable homes.

Sincerely,

Shawn Mayer
Harris & Sloan Consulting Engineers, Inc.