

DOCKETED	
Docket Number:	24-BSTD-01
Project Title:	2025 Energy Code Rulemaking
TN #:	257150
Document Title:	ELEM3NTS Comments - Comment from ELEM3NTS Team
Description:	N/A
Filer:	System
Organization:	ELEM3NTS
Submitter Role:	Public
Submission Date:	6/20/2024 10:12:25 AM
Docketed Date:	6/20/2024

*Comment Received From: ELEM3NTS
Submitted On: 6/20/2024
Docket Number: 24-BSTD-01*

Comment from ELEM3NTS Team

Dear Energy Commission,

We have been in the field for more than 10 years, conducting HERS tests and energy assessments for private homeowners and contractors. Through our experience, we have identified four major actors in this process: public agencies (e.g., CA Energy Commission, city, counties, etc.), homeowners, contractors, and raters. Attempting to remove the responsibilities of one of these actors and redistribute them to another is fundamentally flawed and will likely result in project failure.

For existing houses, the clear solutions are as follows:

- Public agencies should prepare informative material to educate all actors involved, particularly the homeowners, not just the raters.
- If the duct system is altered, the contractor should be accountable for the job performed under the current standards, whether it is 10% or 5%.
- If the homeowner opts out of duct replacement, a HERS test should be conducted to inform them about the condition of the duct system. Based on the rater's findings, the homeowner can make an informed decision regarding duct replacement.
- The building inspector, being the final point of contact with the homeowners, should leverage their experience and the HERS test results to guide homeowners in their duct system decisions.
- The California Energy Commission should create a one-page flyer to be distributed to homeowners, clearly explaining the process.

Simplicity and teamwork are the keys to success.

Sincerely,

ELEM3NTS TEAM

Energy Efficient Home

www.e3-elements.com
info@e3-elements.com