

DOCKETED

Docket Number:	15-MISC-02
Project Title:	2013 Building Energy Efficiency Standards
TN #:	204104
Document Title:	John Townsend Comments: On 2013 Title 24 Updated Regulations
Description:	N/A
Filer:	System
Organization:	Build By Design Inc.
Submitter Role:	Public
Submission Date:	4/9/2015 4:13:12 PM
Docketed Date:	4/9/2015

Comment Received From: John Townsend

Submitted On: 4/9/2015

Docket Number: 15-MISC-02

Comments for the Docket on Title-24 2013 updated regulations California Energy Commission Docket #15-MISC-02 Issue - 2013 T-24 Updates

Comments for the Docket on Title-24 2013 updated regulations

California Energy Commission Docket #15-MISC-02

Issue - 2013 T-24 Updates

I have been a building contractor in California for over 35 years and have always been proud of the fact that California was regarded as a the leader in the world with regards to energy-efficient guideline's and regulation. However I have deep concerns about the direction and the lack of responsible insightful guidance in developing the new Title 24 standards. My company has been and is currently engaged in designing and building Net Zero structures. Ten years ago it was difficult for me to explain to my clients the need for the Title 24 standards. But Californians have come a long way since AB32 and I am currently finding enthusiastic acceptance of energy efficient building design that does not burn or use fossil fuels. Geothermal heat pumps combined with other energy-efficient measures is the best methodology we have found for designing Net Zero buildings. Respectfully, I do not understand why you would put impediments in the way of case proven and EPA recognized technologies.

Title 24 is the primary barrier to the widespread use of geothermal heat pumps.

The "approved" California residential and nonresidential compliance software does not accurately model geothermal heat pump systems.

In 2012, Governor Brown signed Assembly Bill 2339 (Williams, Chapter 608, Statutes of 2012) which requires the Energy Commission to evaluate policies to help overcome barriers to geothermal heat pump and ground loop technologies. In order to support the State of California's carbon, energy, and water saving goals the industry needs a simple, uniform mechanism to operate under the current and future versions of Title 24. The state should recognize these technologies with superior efficiency of energy and water savings in the Title 24 compliance software.

Respectfully,

John Townsend

Build By Design Inc.