

DOCKETED

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Additional submitted attachment is included below.



1375 Central Avenue • Santa Rosa • CA 95401
707-571-8384 • Fax 707-569-9041 • License #805918

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HVAC GeoExchange Contractor

Comments for the Docket on Title-24 updated regulations

California Energy Commission Docket #15-MISC-02

Issue – 2013 T-24 Update – Title 24 is the primary barrier to the widespread use of GeoExchange (Geothermal) Heat Pumps

I have to thank you in advance for taking my comments and understanding that I am just a contractor wanting to make a difference.

Outcome Based is our new Title 24 Goals – Correct?

- Most energy efficient
- Renewable energy
- Carbon Free
- Most aggressive water conservation plan

Unfortunately you do not have the best of tools to calculate this Outcome Based Goal

I understand you do not have the bandwidth to create all of these tool with what you have to work with, so we need to start thinking outside the box. We want the most energy efficient systems installed so what can we do to make that happen with out to much extra man power and expense to get it there.

As a specialty contractor doing business in California again we are feeling very frustrated by the fact that California is again making it even more difficult to do business here.

Not only have we spent the last 19 year setting ourselves apart from your normal HVAC contractor by all of the extra training we needed, the expense of specialty tools and equipment necessary to install GeoExchange systems properly in California. We have also spend many of these years training the States Environmental Health Inspectors on Geothermal System and how they should be inspected and install properly. Spending time and finances on getting AB 2339 past only to hit another boulder in the road.

So again thinking **Outcome Based** and the easiest way to incorporate Geothermal Heating and Cooling Systems into these new regulations, can we not just add wording that would allow this technology to be installed? Maybe by just using the Manufactures documentation of the equipment would be sufficient enough, they have tested and proved its performance already. Why does this need to be so difficult if everything is already pointing to the fact that Geothermal or GeoExchange is the most energy efficient heating and cooling system out there.

Respectfully

Beth L Morelli

CFO