

DOCKETED

Docket Number:	15-MISC-02
Project Title:	2013 Building Energy Efficiency Standards
TN #:	204239
Document Title:	Kent Penning Comments: HERS Rater Requirements
Description:	N/A
Filer:	System
Organization:	Kent Penning
Submitter Role:	Public
Submission Date:	4/17/2015 2:59:59 PM
Docketed Date:	4/17/2015

Comment Received From: Kent Penning

Submitted On: 4/17/2015

Docket Number: 15-MISC-02

HERS Rater Requirements

Energy Commission April 15, 2015

Dockets Office MS-4

Re: Docket No 15-MISC-02

1516 Ninth Street

Sacramento, CA 95814-5512

Re: HERS Rater Requirements

Energy Commission,

We distribute HVAC equipment in California, your HERS rater requirements have and will continue to directly affect our firm. Be aware that this red tape is driving contractors and more importantly end users to repair old equipment that is NOT energy efficient to prevent the more costly regulations that you are supporting today. Believe it we see it daily.

We tuned into your public input forum on April 10th. I want to add some of my personal comments to what you had heard so far.

I wish to express is that the CEC needs to adapt a blanket approval of GHPs in the 2016 Title 24 code until such time as the CEC can develop an alternative compliance method for GHPs

The comment that I wish to express is that all the HERS Rater requirements are crazy. This is not adding any value to a project. The Public does not want it, it is making them want no permit for the jobs. We spend a lot of time telling them it is a requirement and they just say that they know people that will do it without a permit if that is what it takes.

This is not creating any good jobs " just useless overhead

This bureaucratic paperwork as written appears to have been created by some individuals that have little to no field experience otherwise it would be obvious to even the most casual observer that will cripple the state by making it too expensive to do business here.

The unintentional consequence is that instead of replacing "old junk" equipment we will be fixing it instead. The paperwork is just too expensive and frankly a pain in the ass.

Living in a country where the government has problems securing its borders or controlling illegal drugs it seems farfetched that another government agency (the CEC) would try to take on something that is much more complicated. So in short it's pretty arrogant and out of touch for the CEC monkeys to think they cram this garbage down the industry's and the public's throat.

You must realize that these regulations are driving the installations underground. If I were an unscrupulous contractor, it wouldn't take much imagination to know that a ton of money could be made by installing stuff without permits and all this HERS nonsense. Understand that taxes, fees, hassles all change behavior to go around your regulations while the legal contractors lose money and job but has to handle the aggravation of extra paperwork and regulation on a job that he/she has to price at a cut throat rate to compete with the illegal underground operations.

The comment/truth I wish to express is that all this Title 24 testing stuff is a huge joke. When visiting conventions it doesn't take long to learn that the public and other states are laughing at the CEC. The public did not accept Prohibition back in the 1930s and they are not accepting this nonsense now. 95% of the public exceeded the posted speed limits on the way to work – they are not going to follow this nonsense either.

Basically the CEC needs to and I would support a blanket approval of Geothermal Heat Pumps (GHPs) in the 2016 Title 24 code until such time as the CEC can develop an alternative compliance method for Geothermal Heat Pumps (GHPs).

Sincerely,

Kent Penning
Partner
GEO