

DOCKETED

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HERS Rater, Why mandate Natural Gas, Why shun Geothermal even if you don't understand it.

Energy Commission April 15, 2015

Dockets Office MS-4

Re: Docket No 15-MISC-02

1516 Ninth St.

Sacramento, CA 95814-5512

Energy Commission,

I am the CEO of Cold Craft, Inc. a residential and commercial HVACR firm in California.

We are midsized, so don't write us off as a mom and pop shop. We regularly are ranked in the Silicon Valley Business Journal's top HVAC contractors, NATE Certified, Diamond Certified, etc. We vary in size from 15-22 people, we have been in business since 1991 (24 years) and we have seen our competitors close down. We see them today retiring early to avoid all of the changes that have been happening. You may wonder how we know this? Well they ask us to buy their firms, we got 2 requests in just the last 30 days. They are tired of the red tape, etc.

You may not be aware that many of us HVAC professionals dialed in to your public conference call on April 10th in a conference call, because frankly we are curious about our future. Please allow me to shed some light on my thoughts and observations.

First, I was there for information and I thought it was rude for the one individual to talk over one of the speakers that was discussing geothermal heat pumps. That makes me think that the CEC is fairly defensive and makes me want to ask why so defensive? What is being hidden? I'd like you to clarify why the CEC is opposed to hearing out and allowing geothermal to be a part of the solution, when it is clearly one of the possibilities.

Listening to your call I was shocked that you are requiring new homes have to be set up on natural gas and it doesn't sit well with me. Why require this when there is a clear alternative to natural gas? From what I know, natural gas has more dangers for the home owner than geothermal - carbon monoxide and hey natural gas carries the possibility of explosions - remember San Bruno, CA and the countless other examples that affect only one or two homes. So requiring this is just not quite right. In addition - this appears contrary to Governor Brown's energy conservation plan, right?

The comment/truth I wish to express is that all this Title 24 testing stuff is a huge waste of time and money, our customer's and our time and money. You just need to make one out of town trip and tell them you are in HVAC and they ask, hey what the heck is happening out there in CA (as they scratch their heads)?

What you need to also know is that people are telling me that they changed their minds they want it fixed, we explain the age and condition plus the price but they will almost do anything to avoid the red tape and they are contacting others to do the work without a permit and that gets them around the red tape of the HERS rater.

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,

Susan Nichol
CEO
Cold Craft, Inc.