

DOCKETED

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30 June, 2015

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-BSTD-03
City of Palo Alto, Proposed Local Ordinance
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments on City of Palo Alto, Proposed Local Ordinance

To Whom This May Appear:

The City of Palo Alto's application includes a "Cost Effectiveness Study" which contains analyses and recommendations that the City has relied upon for this local ordinance proposal. A very cursory review of the residential recommendations in this document suggests that some of this information may be incomplete or in error. Specifically, the text above the Residential Packages Tables 14 and 15 does not appear to correctly describe the results actually presented in those tables.

The text above Table 14 states:

"The single family 10% package can be met with two individual measures: high performance attics, or instantaneous water heaters, as shown in Table 14."

However, Table 14 appears to contain no data on water heaters.

The text above Table 15 states:

"The single family 15% package adds the high performance walls measure to the instantaneous water heater measure, as shown in Table 15."

However, Table 15 appears to contain no data on high performance walls.

GeoPraxis fully supports Palo Alto's intent to pass and enforce a reach ordinance; therefore we are hopeful that these apparent inconsistencies do not indicate any material errors in the underlying analysis or recommendations actually intended.

Sincerely,

GeoPraxis, Inc., a California corporation

By: _____

Thomas P. Conlon, President