

## DOCKETED

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*Comment Received From: Michael E. Bachand*

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**CalCERTS, Inc. Comments**

*Additional submitted attachment is included below.*



31 Natoma Street, Suite 120  
Folsom, CA 95630  
Voice: 916-985-3400  
Fax: 916-985-3402  
Email: [info@calcerts.com](mailto:info@calcerts.com)  
Website: [www.calcerts.com](http://www.calcerts.com)

November 1, 2016

California Energy Commission  
Dockets Office MS-4  
1516 Ninth Street  
Sacramento, California 95814

RE: Docket No. 16-EBP-01  
2016 Existing Building Energy Efficiency Action Draft Plan Update

Dear Commissioner McAllister:

Thank you for the opportunity to provide comments on the *Existing Buildings Energy Efficiency Action Plan Updates*.

As the only approved Whole House Home Energy Rating Provider in California, we offer a unique experience and perspective on the Home Energy Rating System (HERS II) activities in the state. The Whole House assessment was a tremendous step that started the development of a state-approved energy assessment program to inform homeowners and guide energy efficiency improvements to homes. However, data shows that the Whole House program was not widely adopted, and in fact, it is simply too complicated for the average homeowner and industry practitioner. CalCERTS does have a large pool of data that could be used to help analyze and form new best practices and ensure that valuable, cost efficient measures do not get lost in oversimplification of asset and energy ratings.

CalCERTS, Inc. supports updating the HERS II regulations to define asset ratings and energy assessment protocols to create a simple, comprehensive, cost effective energy efficiency pathway for residential homeowners. Ideally, an asset rating can capture all of the data points required for an energy efficiency assessment. Such a system would support an expanded workforce, making it easy for a Rater to develop an energy assessment from an existing asset rating, or for a Property Appraiser to provide an appraisal and an asset rating at the same time.

CalCERTS believes that the inclusion of Real Estate Appraisers and Real Estate Brokers could greatly enhance the uptake of these asset ratings and energy efficiency ratings in the general market. While some efforts have been undertaken in the past to bring the California Association of Realtors into the rating process, the Action Plan Update presents a uniquely strong, well-vetted and supported process that could achieve a level of success in bringing these organizations to the table. This effort to bring Realtors into the energy efficiency rating process must be enhanced by inclusion of the Real Estate Appraiser's association(s).

As the Commission completes their analysis, CalCERTS encourages the Commission to work closely with its HERS Providers, Raters and software producers to ensure that any changes to the regulation avoid market confusion while providing true energy efficiency for the people of California. While it is a large task, it could be best to provide software modules, enhancements or full versions of software similar to the CBECC software so that uniformity and reliability of calculation software can be more reliable.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Michael E. Bachand". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Michael E. Bachand,  
CalCERTS, Inc.  
Chief Executive Officer