

## DOCKETED

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## **Improving Compliance and enforcement of HVAC Change outs**

It is quite apparent that compliance with energy efficiency code requirements on HVAC change outs are dismal at best. There has been a lot of finger pointing as to who is responsible and why it is so poor, one of the key problems is that local jurisdictions have no tools to determine where equipment is being installed without permits.

This could all be solved with a change in the requirements for when a CF-1R form is required to be filled out and registered for refrigerant carrying equipment. If you would change the regulations to require a CF-1R to be registered as soon as the equipment enters the state with the address on the CF-1R being filled out with the location of the equipment and its owner. So for example when the Manufacture ships a condensing system to a distributor he is required to fill out and register the CF-1R, and the owner would be the distributor and his address, when the Distributor sells it to a Dealer the currently registered CF-1R is updated to the new owner (the Dealer) and his address, and when the dealer finally installs it he goes to the registry and modifies it again showing the installation address and the owners name.

By using this process which all of the registries agree could easily be done the equipment is tracked nothing is required that is not all ready required in code. And every jurisdiction in the state could look into the registries and see where equipment is, and if a dealer is a small operation and he has 300 units in stock according to the registry it is easy enough to pay them a visit and ask to see all of these units. When he can't produce them it is really easy for the CSLB to go after them for a failure to keep the records up, and when he starts putting in where the equipment is then jurisdictions can pursue both contractor and property owners for a failure to obtain permits, and properly install this equipment.

This process does not collect any information that is not all ready required, so no manufacture can state we are collecting proprietary information, it also makes enforcement far easier for all that are required to enforce these requirements and will quickly expose those who are trying to avoid installing equipment in a code compliant manner.