

DOCKETED

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General Opinion on Draft 2019 Section 130.1 Language

Additional submitted attachment is included below.

Oct 20th, 2017

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Re: Docket # 17-BSTD-01
Pre-Rulemaking 2019 Building Energy Efficiency Standards Section 130.1:
General Comment

INTRODUCTION:

It appears that comments on the draft language are still being accepted today.

ABSTRACT:

This is a personal opinion. No other entities or agencies are responsible for its' content.

If the 2019 code is going to be released in any kind of a timely manner; I would suggest *not*, (essentially), re-writing Section 130.1 of the Building Energy Efficiency Standards. I *think*, (just an opinion), that this section should be returned to the 2016 version; modifications can proceed from there. In fact: I think returning section(s) 130.1 (c) 5, 6, and 7 to the 2013 version of the code would be a good start.

THE ARGUMENT:

The 2013 code was released 6-months late;
The 2016 code was released 1-year late;
The 2019 code will be released ...

Proposed solution:

Return the code section 130.1 to its' previous form, but with some clarifying additions.

Allow another round of pre-rulemaking comments.

Thank You,

Robert A. Shearer, BSEE