

DOCKETED

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PV Verification Comments-DuctTesters

Additional submitted attachment is included below.

February 1, 2019

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket #17-BSTD-02 – 2019 Building Energy Efficiency Standards

Attn: Commissioner McAllister

DuctTesters is an energy consulting and verification company servicing the California residential construction markets. DuctTesters has been working to close the gap between developer/builders and their trade contractors, as related to Title 24, Part 6 compliance. DuctTesters has been involved in more than 2,000 different projects. Projects include: new, existing, alterations, and additions of...resident owned, custom and production single family residential homes, commercial, affordable, and multi-family properties. DuctTesters supports the 2019 Title 24 Standards update and the efforts of CEC staff.

DuctTesters believes that HERS verification is a necessary part of ensuring compliance with California's energy code. We strongly support energy code and want to continue to make sure efficiency measures are installed correctly. The new requirement of solar on every new home that has been proposed with the draft standards language means a huge change in building industry practice. The solar compliance credit is a major factor in compliance with the proposed 2019 Standards but there is no required verification. Without this verification, there will be no assurance that a large amount of energy savings attributed to new homes is actually affected.

DuctTesters appreciates the opportunity to provide input and would like to request that the CEC include HERS verification of solar systems and batteries into the 2019 Standards. We are available to discuss with CEC staff and support this effort.

Respectfully,


Dave Hegarty
President, DuctTesters