

DOCKETED

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Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
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Comment Received From: Wayne Alldredge

Submitted On: 2/9/2018

Docket Number: 17-BSTD-02

Comment on submitted comment from Lyn Gomes

I would like to file a response to:

Docket Number: 17-BSTD-02

Project Title: 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

TN Number: 222456

Title: Comment on Proposed 2019 Standards Section 120.8

Lyn Gomes, CCP, PE, LEED AP, CLCATT, of kW Engineering submitted a letter filed as the above mentioned Docket. In that letter, the proposed language in the Attachment recommending a change to the definition in Section 10-102 states:

“For buildings less than 10,000 square feet, this signer may be the engineer or architect of record. For buildings greater than 10,000 square feet but less than 50,000 square feet, this signer shall be a qualified in-house engineer or architect with no other project involvement or a third party engineer, architect, or contractor, or certified commissioning professional. For buildings greater than 50,000 square feet and all buildings with complex mechanical systems serving more than 10,000 square feet, this signer shall be a third party engineer, architect, or contractor certified commissioning professional.”

The proposed language is eliminating the third party requirement which we believe is simply a typographical error. The proposed language should state:

“For buildings less than 10,000 square feet, this signer may be the engineer or architect of record. For buildings greater than 10,000 square feet but less than 50,000 square feet, this signer shall be a qualified in-house engineer or architect with no other project involvement or a third party engineer, architect, or contractor, or certified commissioning professional. For buildings greater than 50,000 square feet and all buildings with complex mechanical systems serving more than 10,000 square feet, this signer shall be a third party engineer, architect, or contractor certified commissioning professional.”

Note that the “third party” appears to have been inadvertently stricken from only the final example. This must be retained.

For the proposed language in Section 120.8(e) and 120.8(d), the consistent language should state this:

For buildings with a conditioned space greater than 50,000 square feet and all buildings with complex mechanical systems servicing more than 10,000 square feet:

(1) The OPR and BOD completed as part of sections 120.8(b) and (c) shall be reviewed by a third party certified commissioning professional.

(2) The requirements of sections 120.8(e), (f), (h)1, and (i) shall be performed by a third party certified commissioning professional.

I thank the Commission and appreciate the opportunity to provide comment.

Wayne Alldredge, LEED-AP, WELL-AP, CEM, CEA, CBCP, EBCP, CMVP, GGP, CalCTP-ATT, HERS Associate Director O&M, Energy, and Commissioning Services

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