

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 17-BSTD-02 |
| Project Title: | 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking |
| TN #: | 222572 |
| Document Title: | Fard Engineers Comments on HERS Rating of PV Systems |
| Description: | N/A |
| Filer: | System |
| Organization: | Fard Engineers |
| Submitter Role: | Public |
| Submission Date: | 2/15/2018 4:31:01 PM |
| Docketed Date: | 2/15/2018 |

Comment Received From: Fard Engineers

Submitted On: 2/15/2018

Docket Number: 17-BSTD-02

on HERS Rating of PV Systems

Additional submitted attachment is included below.

From: Avery Colter <Avery@fard.com>
Sent: Thursday, February 15, 2018 4:27 PM
To: Energy - Docket Optical System
Subject: "Docket #17-BSTD-02": HERS Rating of PV Systems

For "Docket #17-BSTD-02"

I am a HERS rater, and my survival the past few years has been made a lot easier with the projects on which I have performed HERS rating on the PV systems. I pride myself on the skill I have developed at this, and the idea that this is no longer going to be the case in the upcoming 2019 code cycle, especially as more buildings are likely going to depend on PV for compliance, seems patently insane to me.

How is the CEC planning to implement the NSHP? Are building department officials going to keep in mind to get the work done – both the PV verification itself and, for extra credit tiers, the other efficiency measures in the buildings – within the NSHP's deadlines?

Building owners should at least have the *option* of having a dedicated worker on these tasks, especially when the State's funds are at stake for proper implementation for the NSHP, CAHP, and other incentive programs.

Please don't make my training and tools worthless. Keep me doing work I enjoy, at which I excel, and which makes me a proud part of taking California toward our collective ZNE objectives: keep HERS rating of PV systems at least as an option!

Avery Ray Colter

CABEC Certified Energy Analyst Residential & Nonresidential
CalCERTS Rater Residential & Nonresidential
LEED-NC BD&C AP

Fard Engineers

(925) 932-5505 x 219
309 Lennon Lane, Suite 200
Walnut Creek, CA 94598-2445

avery@fard.com