DOCKETED	
<b>Docket Number:</b>	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	222607
<b>Document Title:</b>	Green Dinosaur Comments Opposition
Description:	N/A
Filer:	System
Organization:	Green Dinosaur/Bing Guerin
Submitter Role:	Public
<b>Submission Date:</b>	2/20/2018 8:33:36 AM
<b>Docketed Date:</b>	2/20/2018

Comment Received From: Green Dinosaur

Submitted On: 2/20/2018 Docket Number: 17-BSTD-02

## Opposition

Additional submitted attachment is included below.

From: Bing Guerin bguerin@greendinosaur.org

Subject: Docket #17-BSTD-02 Date: February 19, 2018 at 2:06 PM To: Docket@energy.ca.gov



## To Whom It May Concern,

I would like to expressing strong opposition to the CEC's proposal to remove HERS verification of Solar V systems, *especially since the CASE report on Solar PV supported HERS verification of PV as a required energy measure.* As currently written, the CEC assumes that resource strained building departments will take on the complicated and time consuming verification of PV. This work *should* be completed by HERS Raters. HERS Raters have specialized solar training that building department inspectors do not have. Plus, since a HERS Rater is already required on newly constructed homes, the cost to add the HERS inspection is small compared to the benefit of ensuring proper installation of the PV system.

Regards,

Bing Guerin 619.508.5265 GreenDinosaur.org B Corp JUST Org