

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222637
<b>Document Title:</b>	Ei Group-James Howard Comments On 2019 Title 24 Code
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Ei Group-James Howard
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/21/2018 8:41:08 AM
<b>Docketed Date:</b>	2/21/2018

*Comment Received From: Ei Group-James Howard*  
*Submitted On: 2/21/2018*  
*Docket Number: 17-BSTD-02*

**On 2019 Title 24 Code**

*Additional submitted attachment is included below.*



02/21/2018

California Energy Commission  
Dockets Office  
Re: Docket No. 17-BSTD-02  
1516 Ninth Street  
Sacramento, CA 95814

Re: Docket No. 17-BSTD-02

Dear Energy Commission Staff:

I respectfully submit this letter to the California Energy Commission to state my dismay about the decision to exclude Solar PV Systems from the Home Energy Rating System (HERS) inspection process in the 2019 Title 24 Code. As a professional in the residential construction industry, I understand the value and importance of comprehensive HERS inspections to ensure homes operate at maximum efficiency to save energy, save the homeowner money over time and ultimately ensure the best possible residence is constructed.

Experience in the field has shown that shading issues are not always properly modeled and neighboring structures that impact solar performance are common. In addition, industry shifts from central inverters to micro-inverters necessitates proper programming of the micro-inverters to ensure they are reporting and communicating accurately with the web boxes.

We feel it is imperative that solar is recognized as a major energy system and be afforded a mandatory HERS inspection in the upcoming 2019 code cycle.

Thank you for taking my professional opinion into consideration during finalization of the 2019 Title 24 Code.

Respectfully submitted,

*James Howard*  
**Field Inspections**