

DOCKETED

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2019 Energy Code - HERS Verification of PV systems

Additional submitted attachment is included below.



California Building Industry Association

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March 5, 2018

To: California Energy Commission - Docket 17-BSTD-02

RE: 2019 Proposed Standards – HERS Verification of PV systems

Introduction:

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light-commercial construction. CBIA member-companies are responsible for over 90% of the new homes constructed in California each year.

Position on including HERS Verification of Rooftop PV Systems:

CBIA supports the current CEC proposal to have local building departments perform the field inspection and verification of residential rooftop PV systems as opposed to adding this to the growing list of HERS verification items.

In general, CBIA is concerned that an increasing amount of inspection and verification of energy-related building standards is being diverted away from local building departments to HERS providers. This is in no way questions the quality of work provided by the HERS raters. However, CBIA has a legitimate concern that we are seeing the emergence of two separate inspection entities for the **same** residential dwelling when there are overlapping inspection and enforcement issues that would be more efficiently handled by one, single governmental entity.

At least for the initial roll-out of the state mandate for residential solar, the inspection and verification of all rooftop PV systems installed on new residential construction can be performed by California building officials during the normal course of construction inspection. Should the CEC find this to be inadequate, it can be addressed in future code updates.

CBIA supports the CEC's position to leave solar off the HERS verification requirement.

Sincerely,

Robert E. Raymer, PE
Senior Engineer / Technical Director