

DOCKETED

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Docket 17-BSTD-02 – Alternative Nonresidential Energy Simulation Engines

Additional submitted attachment is included below.



March 14, 2018

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-BSTD-02
1516 Ninth Street
Sacramento, CA 95814-5512
CC: Mike Wilson, Executive Director, IBPSA-USA

Re: Comments on the Proposed 2019 Energy Code, Alternative Nonresidential Energy Simulation Engines

Dear Commissioner McAllister:

On behalf of the IBPSA-USA/Los Angeles Chapter, we wholeheartedly support the CEC's decision to implement the proposed language of the new section 1.1.5 regarding the ability for nonresidential software to use alternate simulation engines.

Our committee feels strongly that simulation users will benefit from the use of alternatives to the CBECC-Com engine and interface as there are alternative engines that provide superior features. These include:

- Enhanced, integrated user interface
- Supporting workflow, strategies and technologies used in design
- Ease of results interrogation and troubleshooting
- User support

Looking to the future, our committee feels it is critical that the ACM allow the use of strategies and technologies as they are being implemented in high performance building designs. This concern is twofold; that energy simulations are able to use strategies and technologies that may not be included in the ACM ruleset and compliance manager, and that the strategies and technologies are applied in the simulation as they are applied in the design itself. For this reason, we take issue with the following proposed language:

“The vendor shall not establish differing compliance rules from those that have been approved by the Energy Commission for use in the Compliance Manager.”

We encourage the Energy Commission to clarify this language so that it does not constrain alternative engines from using strategies and technologies for the proposed design model simply because they have not been implemented in the ACM or the compliance manager.

Sincerely,

IBPSA-USA/Los Angeles Chapter Organizing Committee