

DOCKETED

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WHPA Comments on CEC Docket 2017-EBP-01

Additional submitted attachment is included below.



Western HVAC Performance Alliance Inc. (WHPA)

Physical Address: 29991 Canyon Hills Road, Suite 1709-303, Lake Elsinore, CA 92532

Mailing Address: 524 San Anselmo Avenue, Suite 109, San Anselmo, CA 94960

951-244-6400 • info@whpa-inc.org

August 2, 2018

By CEC Electronic Commenting System

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
Docket No. 2017-EBP-01
1516 Ninth Street
Sacramento, CA 95814

RE: Docket 2017-EBP-01: WHPA Comments on CEC's Request for the Promotion of Regulatory Compliance in the Installation of Central Air-Conditioning and Heat Pump Systems

Dear Commissioner McAllister:

Western HVAC Performance Alliance Inc. (WHPA) respectfully submits the following comments towards Docket 2017-EBP-01 to the California Energy Commission (CEC) on the Workshop for Promotion of Regulatory Compliance in the Installation of Central Air Conditioning and Heat Pumps.

Recommendations from WHPA Research Library

WHPA has an extensive research library of past work products representative of the immense institutional knowledge and influence the WHPA has to offer, many of which were incorporated into activities of the CEC [including the *Existing Buildings Energy Efficiency Action Plan 2016 Update* (EBEE-AP)], the California Public Utilities Commission (CPUC), the California Investor Owned Utilities (IOUs), and other interested parties. WHPA recommends specific review of the following most recent reports for recommendations relevant to the above referenced topic as consolidated from input and efforts of our broad and diverse stakeholder membership body:

From the WHPA Compliance Committee

- **November 2017 - Understanding the Residential HVAC Compliance Shortfall**
(suggested solutions to barriers identified for EBEE-AP Sub-strategy 1.5.5 by the WHPA EBEE Committee)

From the WHPA Compliance Online Permitting Working Group (OPWG)

- **November 2017 - Feasibility of Online Permitting**

From the WHPA Existing Buildings Energy Efficiency Action Plan Committee (EBEE)

- **12-14-16 EBEE Action Plan 2016 Update Input (Recommendations)**

WHPA will be submitting further comments with more detailed actionable next steps, including recommendation for an interactive logic model for California process flow as a first step after WHPA's attendance at the August 3, 2018 CEC Commissioner Workshop on Promotion of Regulatory Compliance in the Installation of Central Air Conditioning and Heat Pumps.

WHPA Work on Serial Number Tracking (SNT)

In reply to public comments made about implementation of an equipment tracking system as a possible solution, please note that WHPA has taken no position on the subject of Serial Number Tracking (SNT). WHPA has previously discussed the topics over a period of years and has developed a draft white paper and pro and con argument position papers that were escalated to the WHPA governing body, but no



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official work products have been approved. Any related votes noted in prior public comments related only to developing body escalation votes for report review.

About WHPA

Western HVAC Performance Alliance Inc. (WHPA) is a California nonprofit public benefit corporation providing, conducting and promoting research and education focused on energy efficiency, environmental quality, and sustainability through the HVACR lens.

WHPA launched in 2009 in response to the portion of the California Energy Efficiency Strategic Plan (CEESP) that reads: *"An HVAC Advisory Group should be chartered to involve high-level HVAC industry stakeholders—such as manufacturers, distributors, and contractors—to coordinate industry sponsorship of and participation in HVAC strategies. Membership should also include other key players, such as the CPUC, Energy Commission, utilities, building owners/managers, consumers, and the Federal government."*

As a nonprofit public benefit corporation, WHPA continues to work as a guiding light for California stakeholders to educate and drive present and future HVACR energy efficiency initiatives and benefit consumers. This includes facilitated communication and action as a broad and diverse stakeholder advisory group whose collective expertise informs the development and implementation of efficiency strategy, policy and programs focused on topics such as HVAC Energy Efficiency and Demand Response, Emerging Technology, the HVACR Industry, HVACR Community Engagement, Consumer Outreach, Codes and Standards, Public Policy, and Workforce Education & Training.

WHPA appreciates the opportunity to provide comments on this important issue.

Best regards,

Elsia Galawish
Executive Director
Western HVAC Performance Alliance Inc. (WHPA)
415-482-1079 Office
415-342-8907 Mobile
Galawish@WHPA-Inc.org

Wendy Worrell
Assistant Director
Western HVAC Performance Alliance Inc. (WHPA)
951-244-6400 Office
949-246-4985 Mobile
Worrell@WHPA-Inc.org