

DOCKETED

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On the 2019 Residential Compliance Manual Chapters

Additional submitted attachment is included below.

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August 3, 2018

To: California Energy Resources Conservation and Development Commission

Docket # 18-BSTD-02

RE: **CalCERTS Comments on the 2019 Residential Compliance Manual Chapters**

CalCERTS Staff has reviewed nearly all of the chapters for the 2019 Residential Compliance Manual (RCM). Our comments are imbedded in the pdf files using the Adobe Acrobat comment feature. These files with the comments were emailed directly to Payam Bozorgchami.

Our comments cover grammatical and spelling errors, and suggestions for clarification. We also make many suggestions for where a topic should be covered in more detail. Some of the more important comments include removing references to using hard copies and paper copies of the forms and emphasizing the use of technology to simplify the process. CalCERTS' main goal in providing these comments is to improve the process related to HERS but we also want to help improve the overall compliance with the energy code by making it easier to understand, enforce, and follow.

We understand that the CEC is limited in time, funding and staff. Unfortunately, the RCM is starting to show its age. The last major rewrite occurred for the 2013 version. Revisions to the RCM were extensive and difficult to follow with tracked changes. We hope that this version will go through another public review process prior to publishing. We suggest retaining much of the information that has been unnecessarily deleted unless it is being replicated elsewhere. This includes Appendix E which should be updated but not removed. The 2019 version has lost a lot of the flow and functionality that the RCM once had. We hope that the CEC will give the RCM the attention that it deserves and at least consider funding another major rewrite for the next code cycle.

While the RCM is not technically "code language" it carries far more weight than any other materials produced outside of the CEC. It is often used to resolve issues in the field when the code language is not clear on a particular issue. Our Field Support staff frequently rely on it to provide "official" answers to questions that we get from the field. It is a very important tool, especially for builders, contractors, installers and HERS raters. The more functional it is, the less questions we (and presumably the CEC Hotline) get and the more smoothly compliance with the energy code will happen.

Thank you for this opportunity to comment on the 2019 code. Please do not hesitate to contact us if you have any questions regarding our comments.

Sincerely,

Russell King, M.E.
Senior Director of Technical Services,
CalCERTS, Inc.