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DOCKETED

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Correction on City of Davis Inspection Program

Correction issued to CEC docket by Mitsubishi Electric US:

In the fall of 2018, I issued comments on behalf of Mitsubishi Electric U.S. regarding compliance strategies and comparative cost effectiveness of serial number tracking versus other enforcement alternatives. In those comments I quoted a City of Davis Building Official as having said that HVAC contractors were fully complying with permit requirements on furnace and AC systems because they had instituted time of sale inspections for code violations and unpermitted work on the whole house. I was later contacted by Greg Mahoney who was not comfortable with my interpretation of what he had said. In his view, he could only say confidently that Davis-based HVAC contractors were complying 100% with the rule, but they were seeing some code violations and installs without permits by other HVAC contractors from surrounding areas. This concern about accuracy of the statement led him to offer to check nine months of inspection reports from 2018, and subsequent to that investigation, he released the following results, here quoting from his email:

“We went back and looked at a year of resale inspections. So far in 2018 we have inspected 560 homes at time of sale. We found 29 homes that have had HVAC change-outs without permit. So it looks like we are at 95% this year. This is not a true representation of how many projects were done with permits, it only documents how many in the group of homes that were sold this year.”

It is important to note that these inspection results include HVAC equipment installed at any time in the last 20 years, and not equipment installed in 2018. Because these were point of sale real-estate inspections, the 95% compliance rate reflects a cumulative total of compliance over a period of decades from this sample of 560 homes, a fairly representative sampling. The 5% non-compliant homes may have been older or more recent installs, and may have been performed either by local HVAC contractors or those from neighboring cities.

Learning curves being what they are, it is likely that the bulk of non-compliant installs are older rather than more recent, but the data is not available. At very least we have data to prove that over some period of time, 95% compliance can be achieved using this point of sale inspection as a key compliance strategy.

Submitted by Bruce Severance, June, 2019