

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-04
<b>Project Title:</b>	2022 Energy Code Compliance Metric
<b>TN #:</b>	239731
<b>Document Title:</b>	Fard Engineers Comments - on Opportunity Costs, Upgrade Speculation and Reactionary Job Killing
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Fard Engineers
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	9/15/2021 3:03:03 PM
<b>Docketed Date:</b>	9/15/2021

*Comment Received From: Fard Engineers  
Submitted On: 9/15/2021  
Docket Number: 19-BSTD-04*

**on Opportunity Costs, Upgrade Speculation and Reactionary Job Killing**

*Additional submitted attachment is included below.*

**From:** [Avery Colter](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 19-BSTD-04: Opportunity Costs, Upgrade Speculation, and Reactionary Job Killing  
**Date:** Wednesday, September 15, 2021 2:59:08 PM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Once again we hear about how horrible electrical outages are, as if the “extremists” in TURN have not already informed us of this for years now, and actually exerted effective pressure on the utilities about this. But the person relaying mentions of these outages to us somehow never has a word about San Bruno or Aliso Canyon. Has anyone tabulated the opportunity costs to homeowners – and for that matter renters – affected by those incidents?

You know, there is a grain of truth in some of these grievances. On KPFA this morning one guest spoke of the tendency of corporate media sources to force the issue of carbon footprint to the individual level, making the ability to reduce carbon footprint an individual thing. And yes, that does create the spectre of elitism on this issue. Here’s the thing though: there is no elitism without individualism. The only way to head off such elitism is to head off this drive of responsibility solely or primarily to the individual level. This is why there is a lot of discussion in and around government about how to subsidize and incentivize the upgrades which matter most.

And here’s the other thing. Some people, like myself, have jobs which are related to these regulations and programs. Is my job to be killed by taking state energy policy backwards? Or do some consider my work a “fake job”? Well, judging by today’s vote tally, if such people do think this of my work, they are a stark minority!

**Avery Ray Colter**

CABEC Certified Energy Analyst Residential & Nonresidential  
CalCERTS Rater Residential & Nonresidential  
CHEERS Rater  
LEED-NC BD&C AP

**Fard Engineers**

Office Landline: (925) 932-5505 x 105 *or* Direct at (925) 446-6185  
iPhone: (925) 381-3754  
200 Gregory Lane, Building A  
Pleasant Hill, CA 94523-3394  
[avery@fard.com](mailto:avery@fard.com)