

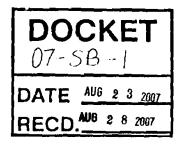
Home Builders Association

of Tulare/Kings Counties, Inc.

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California Energy Commission Dockets Office 1516 Ninth Street MS-4 Sacramento, CA 95814-5512



Re: Docket No. 07-SB-1 Comments on Senate Bill 1: Eligibility Requirements Staff Report

After reviewing the Staff Report regarding Eligibility Requirements for solar electric installations on existing homes and having reviewed the Guidebook for the New Solar Homes Partnership, the Home Builders Association of Tulare & Kings Counties has the following recommendations:

Existing Homes:

Do not implement any additional energy conservation requirements on existing homes. It is our belief that this will interfere with the Governor's *Million Solar Roofs*' initiative.

New Homes:

Eliminate or drastically reduce the requirements now being enforced by the New Solar Homes Partnership. The program as currently implemented is restrictive, punitive and redundant. Our members have been providing solar options and have been building solar neighborhoods long before the New Solar Home Partnership was created. The necessity of increasing energy efficiency by 15% or more above the already strict Title 24 requirements is a costly burden that will deter many builders from supporting the Governor's goal.

The local building authorities and the utility providers have been perfectly capable of implementing the original program and inspecting the solar systems that our builders have been installing.

The New Solar Home Partnership does not take into consideration the true costs of implementation, the amount of unnecessary paperwork, or the effect it has had on the builders who already include solar in their homes.

Sincerelv Robert J. Keenan

Robert J.-Keenan President/CEO

Affiliated with ...

