



February 11, 2008

California Energy Commission  
Attention Docket No. 07-BSTD-1  
Dockets Office  
1516 Ninth Street, MS - 4  
Sacramento, CA 95814

<b>DOCKET</b>	
07-BSTD-1	
<b>DATE</b>	FEB 11 2008
<b>RECD.</b>	FEB 13 2008

Re: Docket #07-BSTD-1, 2008 Building Energy Efficiency Standards – HERS Inspection and Verification Process

Dear Sirs:

We offer the following comments in regards to comments offered by the CBIA:

For this code cycle, we support the Commission's efforts to ensure that, where 1 in 7 group sampling is allowed for verification and diagnostic testing, such sampling is truly random. While we appreciate CBIA's concerns, we disagree with their January 2, 2008 comment letter in which they request the Energy Commission to allow the issuance of a CF-4R verification for a sample group prior to the construction of all seven dwellings within the group. This proposal would result in non-random sampling. Instead, only the first building constructed in every group would be sampled. Contractors would thus have an incentive to put their best installers on the first building and then to use cheaper and less-experienced installers on the next six buildings. This would defeat the purpose and underlying rationale for allowing group sampling in the first place.

We appreciate the opportunity to offer input on the revisions to the building energy efficiency standards for California. If you have any questions please feel free to contact me.

For CAL SMACNA /SMWIA Committee on Energy and the Environment

Sincerely,

Erik S Emblem  
3E International Incorporated  
1809 S Street - Suite 101-207  
Sacramento, CA 95811  
[eeblem@3Eintinc.net](mailto:eeblem@3Eintinc.net)  
916-273-7842

CC: Bill Pennington, CEC