



HERS Provider
Title 24 • Energy Star
RESNET

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Re: Comments to the 15 Day language

To: CEC commissioners and staff

DOCKET	
07-BSTD-1	
DATE	APR 22 2008
RECD.	APR 28 2008

We appreciate all the hard work done on behalf of the goal of better energy efficiency implementation in both the new construction and alterations portions of the Standards and Appendices, but we have a few comments we think are vital to help accomplish these goals.

1. Standards Section 152(b)(1)(e)(iii) a 60% reduction in leakage prior to installation and a visual smoke test should require 100% HERS verification on the smoke test, as this is a major area where contractors are circumventing the Standards. See the next comment regarding the Appendices.
2. Table RA3.1-2 we strongly urge the language retain the words "with 100% verification" in the 60% reduction of leakage requirement as this is a major area of contractor cheating already, plus, this would allow sampling of this measure, and there is just no evidence to support that fact that the contractors will do this faithfully. We have documents indicating that the 60% reduction is taken, but the final duct test by the C20 does not come anywhere near the number they indicate. If they do incorrect math and pass this through it can get into a sampling pool and have massive leaks.
3. RA Section 2.4.3 regarding Third Party QC systems: Allowing "specialty" contractors to perform part of the work of constructing a tightly constructed duct system with proper airflow defeats the training and subsequent consequences that has been given to the installer. This promotes the failure of the training that is the stated benefit upon which the entire TPQC program is predicated. The installing technicians will not be properly disposed to construct tight ducts, nor to test their own work and see their results first hand. Allowing this process is irresponsible. Since the "specialty" contractor is going to do the "incurruptible data transmission" who is going to determine what the nominal flow should be? Who determines if the condenser is a 4 ton, 5 ton, etc.? Where does this verification get logged into the registry? How does the installing C20 warrant his work after it has been modified by another "specialty" contractor? Who warrants performance of this system in terms of energy and comfort?
4. RA Section 2.4.3: The language leaves out the important fact that the data required to be kept is in the PROVIDER'S data registry....not a database maintained by the TPQC. The TPQC is not the PROVIDER.
5. RA Section 2.4.4: The RA does not specify that the HERS rater MUST do the test when it is 55F, and that the builder is still responsible for that test after the homeowner has moved in.

Respectfully submitted,

Michael E. Bachand, President
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