

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of

Preparation of the
*Draft Phase II Home Energy Rating System
Program Regulations*

Docket No. 08-HERS-1

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DATE	<u>AUG 25 2008</u>
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**COMMENTS OF THE COUNTY OF LOS ANGELES
ON CALIFORNIA HOME ENERGY RATING SYSTEM PROGRAM**

Jody S. London
P.O. Box 3629
Oakland, California 94609
510-459-0667
jody_london_consulting@earthlink.net

FOR The County of Los Angeles

August 25, 2008

I. INTRODUCTION

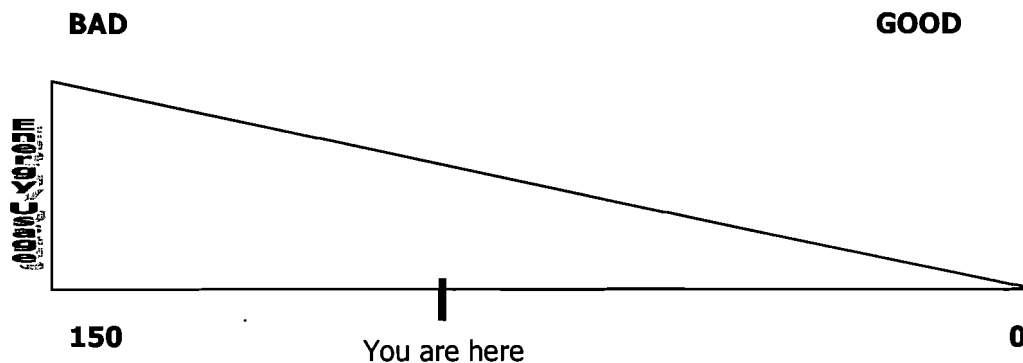
The County of Los Angeles, Internal Services Department ("County") welcomes this opportunity to comment on the Phase 2 regulations development for the California Home Energy Rating System program. The County participated in the workshops on May 2, 2008 and August 14, 2008, submitted opening comments on May 9, 2008, and intends to continue coordinating with the California Energy Commission ("CEC") on building energy performance and rating programs. The Board of Supervisors of the County of Los Angeles has directed staff to develop a pilot building energy rating system, and the County looks forward to working with CEC staff on our related programs.

The County encourages the CEC to be mindful as it develops the Phase 2 regulations of the ultimate audience for the HERS program: residents, both owners and tenants. The HERS program must be accessible to the average person, and must not be overly intrusive.

II. MAKING HERS ACCESSIBLE TO RESIDENTS

In our May 9, 2008 comments, the County identified the need for an easy-to-understand rating scale, and a streamlined approach to the actual rating process as important to program success. We continue to focus our comments on these two areas, which are likely the two key points of interaction with the HERS program for most residents.

In terms of the rating, the revised regulations have refined the scale, but continue to use a metric where zero is the best. The County encourages the CEC to follow the request of Commissioner Rosenfeld at the August 14 workshop and conduct some consumer research on the accessibility of a 150 to zero scale to average residents. The County agrees with Commissioner Rosenfeld that the rating graphic should be refined to make it very clear, in black and white, which end is "good" and which end is "bad." If the CEC continues to use a measurement scale where zero is the best, we encourage the CEC to investigate the feasibility of a scale that uses a bar graph to indicate higher usage, as suggested by the City of Berkeley in the May 9 comments. A very rough facsimile is provided below.



The County of Los Angeles continues to encourage the CEC to streamline the actual rating process. We take no position on which type of entity is best suited to perform the rating and make recommendations. The bottom line must be a rating process that is quick and efficient. The comments at the August 14 workshop about the number of visits required to obtain a useful rating and recommendations should be given great weight. Most people simply do not have time to be at their house or apartment for multiple visits from energy raters, auditors, contractors, and/or evaluators. Distinctions between market providers are not relevant to the average person who is commissioning the rating, and merely wants an accurate rating in a timely manner that tells him or her steps he or she needs to take to improve the energy performance of the home.

Finally, the County reiterates our comments from May the importance of ensuring that this relatively new category of service providers is launched credibly. The CEC should determine whether there will be any professional board oversight to ensure that customers are getting certified ratings, and have recourse in the event of problems. The CEC also should be coordinating with the state's higher education systems, including the community college system, to develop accredited programs for this new workforce.

III. CONCLUSION

While the CEC should ensure that the HERS regulations are technically rigorous, it must also be mindful that the intended audience for this program is not as sophisticated on energy issues as many of those at whom other CEC programs are targeted. It is important that the actual rating system be easy-to-understand, and that the process of getting a home rated be as

streamlined as possible. The County of Los Angeles looks forward to working with the CEC on building rating programs, particularly in developing a pilot in the County in the next few months.