

October 6th, 2008

Docket #07-SB-1

Comments on Proposed Changes to SB 1 Guidelines

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CalHERS represents the independent 3rd party Raters profession in California. We involve, educate develop and support Raters as a professionals to "raise the bar" in terms of ethics, accountability, and competence. We develop the Rating Profession by working with other stakeholders to make energy efficiency programs simple, clear, consistent, affordable, credible, achieve real energy savings, and protect the consumer.

HERS Raters are the front line troops, indeed, the face of the California Energy Commission. HERS Raters do the legwork of Title 24 compliance and because of this; we offer valuable real-world perspectives that others may not have. Our numbers are growing and we will be more valuable as more responsibility is laid at our feet.

Our membership is comprised of HERS Raters from CHEERS, CalCERTS, and CBPCA representing large and small companies. Our members are motivated to see that the HERS profession in California is elevated and that policies and programs that directly affect HERS raters include opinions from our CalHERS members.

HERS Raters have up till this point not been recognized as a valuable industry stakeholder group.

**ENERGY AUDITING**

The CPUC recently adopted the 2009-2020 Strategic Efficiency Plan. It calls for a reduction of energy use in existing homes of 15% by 2015 and 40% by 2020. The New Solar Home Partnership requires new homes to be a minimum of 15% or 35% above code to get a solar PV rebate.

With net metering consumers loose site of there actual use (we should meter use and production separately) and consume more electricity. Time of Use rates consumers that have excess production receive a credit on their bill (which they can not keep) and confuse a Zero bill with Zero Net electrical use. This further isolates them from their actual use and gives an incentive to use more electricity. Consumers that don't have excess production are very unhappy when there bills go up.

Existing buildings should be required to have met some minimum level of improvement to above minimum current code and or show some level of improvement over current use before being given a PV rebate. The Multifamily Home retrofit program run by HMG a few years ago required a minimum of 15% improvement on the CF-1R to get the rebates.

*The auditing requirements need to be strengthened to support the goals of the Strategic EE Plan and be constitant with the NSHP, and to prioritize energy conservation & efficiency over production.*

**HERS VERIFICATION**

The guidelines allow the program administrators (IOU's HERS Raters do the PV Verifications, do them themselves, or hire a qualified subcontractor. All the IOU's so far seem to have chosen not to have HERS Raters do the Verifications.

This undermines the NSHP, the Million Solar Roof Initiative, CSI and the Strategic Energy EE Plan by reducing the number of PV systems installed.

The verification costs come out of the budget to administer the program (reducing the amount for rebates?). In the NSHP the developer or the solar installer have to pay for the PV Verification. The NSHP process has not been easy for developer, energy consultants, solar installers, or HERS Raters. Some of this is due to poor design of the program, but most of it is due to poor education of all the parties into how it works, and how to work together. The result is developers and solar installers choose not have their projects go through NSHP, but to put them through the CSI (existing buildings). This drives the incentives down quicker for those that can't go through NSHP, and results in fewer PV systems being installed. It is now the customer's decision to install a PV system or not, with a higher installed cost, and possibly voiding roofing warranties installing racking. The utilities have been sampling installations in a way that is inconsistent with how we HERS Raters would have to do it. They only sample 1 of 7 of all installations, and not the 1<sup>st</sup> of each installer, and 1 of 7 of additional installation of each installer.

We HERS Raters were trained to do the PV Verifications, are qualified to do them, want to do them, and have the capacity to do the work (excess of HERS Raters especially with the housing downturn). There is no difference between a new home and one that has been there for 100 years.

***HERS Verification of the PV systems should be required to be done by independent HERS Raters.***

We HERS Raters support the solar industry in trying to make the PV incentive programs easier for everyone. We can only meet our goals by implementing energy conservation, energy efficiency and renewable energy together. We look forward to working toward our mutual goals and benefit.

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CC: **CalHers Board**  
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