

**Docket Optical System - HERS Rulemaking**

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**Date:** 10/15/2008 9:22 AM  
**Subject:** HERS Rulemaking  
**CC:** <hlam@energy.state.ca.us>

**DOCKET****08-HERS-2**DATE OCT 15 2008RECD. OCT 15 2008

Dear Sir / Madam:

This comment may be a little out of the focus of HERS activity which by definition is meant for residences. Could consideration be given to extend the purview to non-residential facilities at least in a limited way? I have noticed that a popular software (Energy Pro) that I use for Title-24 calculations, does have provisions to invoke HERS credits but does not clarify as to what credits can be taken for non-residential facility if any.

I represent a company which manufactures modular buildings used in educational and commercial facilities and I can see the value of using HERS which can be administered in our plant through a third party. This gives us an additional avenue to comply with Title-24 requirements as we are always faced with challenges trying to improve on elements of the envelope given the physical constraints of a modular building.

Sincerely

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