



**Comments on California Home Energy Rating System Program
Phase II Regulations Development
Docket Number: 08-HERS-2**

October 14, 2008

The Natural Resource Defense Council (NRDC) appreciates the opportunity to comment on the proposed Home Energy Rating System Program (HERS) II Rulemaking. While NRDC unequivocally supports the development of such a program and the efforts of the California Energy Commission (CEC), we would like to see further investigation into ways of harmonizing the HERS II program with existing nationwide programs.

As in our previous comments on May 8th, 2008, we believe that in order for this program to have the same scope of relevance outside of California that it will have inside the state, the option to calculate a HERS score using the International Energy Conservation Code (IECC) or the Residential Energy Savings Network (RESNET) technical manual for generating the reference home should be provided. Simply including the option to run the simulation software using either the IECC or CA Title 24 as the reference home will allow the customer for each modeling run to take advantage of state incentives, federal incentives, tax-credits or mortgage options based on a HERS score as compared to an appropriate baseline. With both reference homes available, a designer could then fine tune his or her design to take full advantage of any incentive programs, state or federal, producing as energy efficient a home as possible.

Conclusions

While the HERS system may have multiple uses, referencing only the California Energy Code may exclude some homeowners from the opportunities available through federal incentive and tax-incentive programs. Allowing at least the functionality in the software to measure a given home against the national baseline should be considered and included.

We appreciate the opportunity to submit our recommendations to improve the program and are available to discuss this matter further with you.

Sincerely,

Nick Zigelbaum
Energy Analyst
Natural Resource Defense Council

CC: Noah Horowitz - NRDC

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08-HERS-2	
DATE	<u>OCT 14 2008</u>
RECD.	<u>OCT 15 2008</u>