

October 15, 2008

**Commissioner Arthur Rosenfeld**  
**Chairman Jackalyne Pfannenstiel**  
Efficiency Committee  
California Energy Commission  
Buildings and Appliances Office  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

**DOCKET**

**08-HERS-2**

DATE OCT 15 2008

RECD. OCT 20 2008

Re: **Docket No. 08-HERS-2**  
**Comments on Implementation Date**

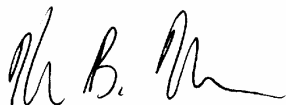
Dear **Commissioner Rosenfeld and Chairman Pfannenstiel:**

I understand that the Commission desires to have these regulations go into effect at the same time as the new building energy standards in July 2009. I urge you to reconsider this implementation date.

These regulations depend on a substantial effort by the private sector to implement. Given the resources available, I believe that it is impossible for the software and HERS industries to respond to both a change in the new building standards and these complicated new HERS regulations at the same time. More time is needed to develop new software, new procedures, new web sites and the training and certification of HERS raters prepared to implement these new HERS rules. Each of these new items requires substantial investment of time, money and personnel, right at the same time as these resources are needed to implement the new building energy standards.

Please postpone implementation of the HERS regulations for 6 months to a year after the building standards are implemented.

Sincerely,



**Ken Nittler, P.E.**  
Enercomp, Inc.