



ENERGY SOLUTIONS FOR PRODUCTION BUILDERS

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December 10, 2008

Helen Lam
California Energy Commission
Building and Appliances Office
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

RE: Docket: 08—HERS-02

ConSol would like to express its concerns on the proposed Rating Scale (California HERS Index) under the Phase II HERS rulemaking. At the last hearing ConSol made comments on whether or not the rating scale reflected scores from the existing California housing stock. Since then we have not seen any CEC study that details how homes will perform until the proposed 0 to 250 point California Home Energy Rating scale. This is a concern as the users of this tool need the scale to give the homeowner a reasonable energy efficiency rating relative to the market.

To clarify the scale ConSol performed an analysis on existing homes that included typical California homes built in five decades from the 1950's through the 1990's. Our results showed that most of the estimated HERS ratings for homes built before 1980 would exceed the proposed Rating Scale (0 to 250). This is a concern since the permit information tracked by the Construction Industry Research Board (CIRB) demonstrate that approximately 62% of existing homes were built or permitted prior to 1980 and most of these homes would have the same rating (>250) on this proposed scale. The table below shows a summary of homes built, per decade (CIRB data).

Decade	Single Family Units Built
pre 1960s	2,392,460
1960s	1,143,459
1970s	1,162,924
1980s	1,135,153
1990s	826,346
2000s	889,181

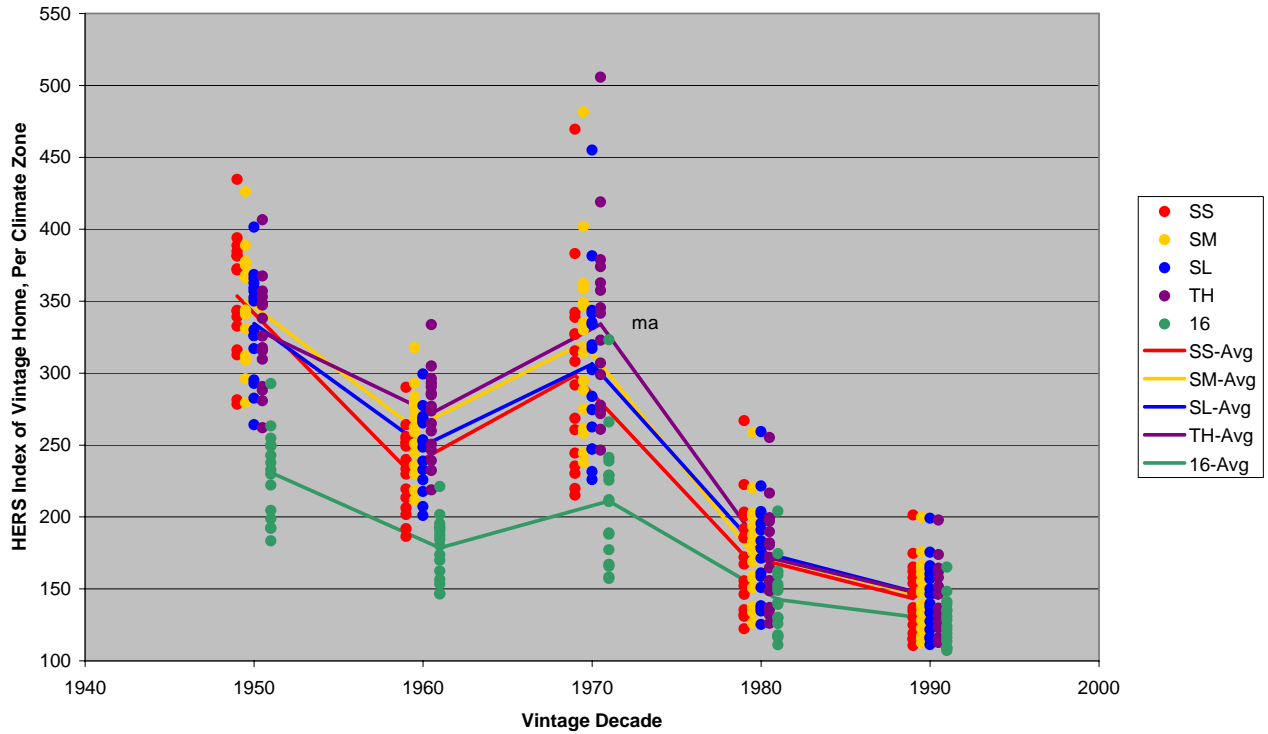
The HERS ratings were created by modeling five building types (small home, medium, large, town home & 16-plex), using historic energy features for homes built in each decade, in which ConSol used the energy efficiency Default Assumptions for Existing Buildings from the California Energy Commissions 2005 Residential Compliance Manual (Table 3-2). These building types were run in five decades for all 16 CEC Climate Zones, using MICROPAS v7.3 and kTDV/sf-yr energy use budgets under the current 2005 Residential Title-24 Standards. ConSol understands that the HERS scale is based on 2008 TDV; however, that 2008 version of MICROPAS is not yet available to the public. ConSol assumes the 2008 version would produce even higher results (larger numbers on the rating scale).

The chart below shows the summary of our results and the average of each HERS rating for the five building types, per decade in all 16 climate zones. Most importantly, it suggests that Rating Scale should be increased from 250 to 400, so homes built prior to 1980 can be recorded using this scale. ConSol is confident that this graph is relatively accurate. ConSol is willing to work with the CEC to explain the assumptions and to ensure its accuracy.



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**Estimated HERS Indexes for Vintage Homes
(Including Approximated non-T24 Loads)**



ConSol looks forward to working with staff to resolving this issue and not delaying the adoption of the HERS Rulemaking.

Sincerely,

President

cc: Art Rosenfeld, Presiding Commissioner
Jackalyne Pfannenstiel, Chair
Bill Pennington, Manager Buildings and Appliance Office
Rashid Mir, Technical Advisor