From: Sandy Miller

**To:** Public Adviser's Office; serena

CC: Docket Optical System; Duane Davies; Laura Murphy

**Date:** 4/21/2009 3:20 PM **Subject:** Re: NSHP Guidebook

**DOCKET** 

06-NSHP-01

DATE April 21 2009

**RECD.** April 21 2009

Hello Ms. Trachta,

We are in receipt of your comments and will have the Commission's Docket office file them in the NSHP docket file. And we will give them consideration when revising the NSHP guidebook. A proposed revised Guidebook is anticipated to be available for public comment during the later part of May, and that may or may not include your recommendations. Thank you for your comments.

Sanford Miller NSHP Lead Renewable Energy Program 916-654-5166

>>> serena <<u>sat@fullcirclearchitecture.com</u>> 4/17/2009 5:38 PM >>>

To whom it may concern,

We understand that the NSHP is revising the guidebook and would like to submit consideration for accepting a commissioning agent in lieu of the HERS rater to submit the CF-4R-PV form. The commissioning agent could be required to be certified by the AABC Commissioning Group (ACG) which is a nonprofit association of certified commissioning authorities dedicated to providing professional, independent commissioning services. The guiding principles for ACG are similar to those of the Associated Air Balance Council (AABC), whose members are expected to maintain high standards of professionalism and technical expertise.

As the regulations and programs move forward to encompass more sustainable construction and require 3rd party reviews for verification, it only makes sense that a commercial standard of review be accepted (if not encouraged) especially on a multi-family housing project which is treated as a commercial building from a code perspective.

We are having the PV system commissioned as part of the LEED process and Commissioning (a commercial standard) is generally understood to be more rigorous than HERS rating (a residential standard). We understand that we need to have the PV system inspected and submit a CF-4R-PV form. We request that the commissioning authority can prepare this form instead of a HERS rater on projects that are seeking LEED certification in order to streamline the green building program documentation.

Thank you for your time and consideration.

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