

Comments on Preliminary State Energy Program Guidelines released by CEC on July 16, 2009,
CEC-150-2009-004-D

To: CEC

From: Patricia Plympton, Navigant Consulting, Inc in support of DOE's Building Technologies
Program

August 5, 2009

Overall, the guidelines and intention of CEC to support a variety of local government consortia led activities to accelerate comprehensive residential energy retrofits by coordinating with the utility Home Performance with ENERGY STAR program look promising, and I look forward to continuing to work with the CEC and other CA stakeholders on this timely and valuable endeavor.

1. On pages 30 and 31, there is no reference to "sun setting" the "prescriptive path" used in Tier II. Does the CEC plan to offer guidance on phasing out the prescriptive path of Tier II and moving home improvement contractors and other trades toward Tier III in order to meet the state goal of 40% energy improvement by 2020 in existing residential homes?
2. On page 31, in the sentence "California also has a strong base of building performance contractors and well-developed training curricula developed by the California Building Performance Contractors Association over the past several years that can easily transferred to the Community College systems and other training organizations to rapidly replicate and expand upon this training through ongoing mentoring, apprenticeships, and on-the-job support for contractors and workers who endeavor to delivery high quality work." Since there are other CA-based organizations that have developed training curricula, I suggest that you do not single out any one organization.
3. On pages 31 and 32 at the top of the page, regarding the sentence that reads "access to and facilitation of retrofit financing, through municipal financing district programs, EECBG funding, Depart of Community Services and Development (CSD) or CPUC administered low-income weatherization programs, other U.S. HUD financing such and Energy Efficient Mortgages and other FHA and HUD financing, Energy Star financing, and utility or local program energy and water rebates and incentives;" there is a newly formed Federal interagency (DOE, HUD, FHA, EPA and Fannie Mae and Freddie Mac) working group exploring guidance on energy efficiency financing products. Energy Star Financing product is a pilot that likely could be used by local government consortia as part of their proposals to the CEC, however, we don't know when the interagency

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working group will offer guidance that could affect the terms and conditions on the Energy Star financing products. In short, it's unclear at this time.

4. On page 32, under 2. *Collaboration with National and State Programs*, the second line should read "The California Comprehensive Residential Building Retrofit Program will collaborate with the U.S EPA/U.S. DOE Home Performance with Energy Star Program (HPwES) for achieving comprehensive, whole-house retrofits." This change will reflect that the program is jointly managed by the US DOE and US EPA. Also, please remove the first line from the next paragraph since the previous change will cover "The DOE is also a strong proponent for HPwES."
5. On page 36, for the Second Tier: Does the CEC plan to include air sealing and duct sealing?
6. On page 36, for the Third Tier: Does the CEC plan to include air sealing? Also in the bullet "Install all Second Tier Measures that are determined to be cost effective and applicable for the house" how does CEC plan to define "cost effective"?