

# DOCKET

11-IEP-1F

DATE JUL 29 2011

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**Date:** July 29, 2011 7:58 AM

**Topic:** Cal energy

July 28, 2011

Re: California Energy Commission Dockets Office, MS-4 Re: Docket No.  
11-IEP-1F

To whom it may concern:

I am a Contractor (CSL#832225) in California. I am also licensed in Florida and Tennessee.

I would like to address the two goals of this proposal: Jobs and Energy. Neither will be accomplished as a result of this.

The proposed energy conservation measures for existing residences and commercial buildings will have the opposite effect as intended. The biggest stumbling block is the constant reference to available financing for making improvements. There is an assumption made here that people will actually sign for additional financing (or qualify for it).

These proposals will slow down construction timelines. There is additional work as well as testing required that slows the process. Without performing any work this alone adds cost to a job. Contractors will not hire more employees. By changing insulation value, etc. the actual labor portion of a job is not affected, only the materials. The only additional labor is the inspectors - and this is a major cost to consumers.

There is also no reference for a guideline as to how much work being proposed on a structure will initiate the requirements. The overall cost of a home performance package is between 15,000 and 30,000. How can people be expected to meet this requirement when they are only doing a small amount of work. In many cases you could be doubling their budget. There is also an equity problem limiting peoples borrowing ability. These requirements could easily cause work not to be done.

People will be laid off, not hired if work is not done at all. As evidenced by the institution of the Cal Green codes as well as the State Fire Marshall's sprinkler requirements, new residential construction has been non existent. The proposal you are making here will do the same to the residential remodel market. Commercial investors will be equally concerned about the additional costs this bill proposes.

The costs for home performance upgrades are not quickly recovered in California's climate. The proposal is to add efficiency, not conservation, but conservation is clearly the area that will accomplish your goals.

The proposed codes to make renovated homes and additions more energy compliant are an unnecessary burden on contractors and homeowners. They will put the cost of doing work to improve ones OWN home out of reach of many people.

It is also not true that adding efficiency to a home makes it more efficient. The user is responsible for the cost of energy at their residence. Neighborhoods and houses are also not the same. Is there a purpose to provide a water restriction on a well / septic property? Are neighborhoods with heavy tree cover at elevation subject to the same requirements of a hot valley area? Energy efficiency is specific to the user and the site.

I am for efficient construction techniques. However I believe this is better accomplished through education of contractors. To maintain my Florida license I am required to take 16 hours of continuing education every two years. I have learned more about efficient construction methodology in these classes than I know the requirements of the title 24 statute. I am able to sell efficient upgrades because of my training - not because they are required. I understand what each site and particular home needs. This is a better way.

I have taken classes given by the CBPCA and our company is a home performance certified contractor with CBPCA and Energy Star. Through my education I have learned how heavily a user can influence the energy consumption of their own home. It is pointless to assume that reducing things like water consumption of a toilet will impact water consumption. Instead of flushing twice, maybe they will flush three times and negate any savings on the old code. Having CFL bulbs does not save money if you leave them on. HVAC systems are not more efficient if they are run all the time. After taking the BPI courses we were constantly told that, " this stuff matters in Minnesota, but it is negligible in our climate. In short most home performance upgrades are expensive, intrusive and do not allow an adequate cost recovery. It is often in the 15 year range for these costs to be recovered. The current title 24 energy code is comprehensive enough. Adding this code is a burden.

I have retooled my business for renovations, as this is the only market that I see. There is some work available in this sector, but the growth potential is better than new construction.

Please consider these arguments in the discussion of this proposal.

Sincerely,

Steven Becker