



DOCKET

10-BSTD-01

DATE _____

RECD. Jan 25 2012

Re: Docket #10-BSTD-01 – Building Energy Efficiency Standards

I would like to comment on Section RA3.3.2.1.2 – Powered Flow Capture Hood Measurement. I strongly disagree on requiring a ‘powered’ flow hood. There are a few reasons for this:

- 1 – This would create financial hardship on who own regular flow hoods. They are quite expensive (approx. \$2,500) and would be rendered useless.
- 2 – The accuracy of regular flow hoods is not perfect, but adequate for the purpose being served which is measuring airflow at return grills to ensure that a minimum is being met. Existing leakage at the return air grill brings into question the accuracy of any type of measurement.
- 3 – Power Flow Capture Hoods will increase costs to the home owner and contractor due to the extra time to perform the testing as well as the additional cost of the equipment.

Compliance for HERS verification is estimated to be between 5% and 10% statewide. I understand the need to continually improve the HERS Standards but I would ask that careful consideration be given to added measures that increase cost and further deter compliance, especially when the current method used it acceptable.

Thanks,

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