



California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET	
10-BSTD-01	
DATE	<u>Jan 25, 2012</u>
REC	<u>Jan 25 2012</u>

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RE: Docket number 10-BSTD-01, Building Energy Efficiency Standards

Dear California Energy Commission:

I am writing as a California HERS rater regarding the adoption of changes to the 2013 Title 24 Energy Codes, specifically item 7: Flow Hoods are to be removed as an approved tool for air flow verification.

I believe the removal of such a valuable tool will negatively impact my ability to efficiently test/screen and rate C-20 HVAC contractors' work. While I understand there are some limitations to using a flow hood, these tools are very helpful apparatus in the field.

Often, the use of the flow hood is the quickest and therefore the most economical way to rate a home for adequate airflow. Measuring airflow via the hood saves valuable time compared to the other methods and when it works, it is my preferred method. Of course when circumstances are such that a flow hood cannot be used, or the results indicate a possible inadequate airflow, I will use another method. Therefore, the removal of the Flow Hood as an acceptable tool only makes our already challenging job even more difficult.

I hope that those in the CEC understand that testing/rating houses is not simply textbook applications of the methods but rather somewhat of an "art" as virtually no house is the same as another and they are not built to "laboratory" specifications. Thus, many homes pose unique challenges AND every day poses a unique testing environment that we raters need to solve. Therefore, having more tools with a wider range of testing environments is much more effective and helpful than a shorter list of tools with a narrower range of usefulness.

I would have thought that the CEC would want to ensure more homes are rated not fewer. Already, getting C-20 contractors, homeowners and particularly cities to buy into the HERS rating system is a challenge. Why add an additional burden on raters which in turn will force us to raise our rates and thus make HERS rating less attractive and something to avoid at all costs. This decision makes no sense and I urge you to reconsider the removal of the flow hood as an acceptable test method.

If you have any questions, I welcome the opportunity to speak with you at greater length regarding this issue.

Thank you for your time and consideration.

Sincerely,
Dav Camras
Owner, HERSRaterLA/HouseSmart Green Solutions