



NRDC Comments in Support of the Proposed 2013 Building Energy Efficiency Standards

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On behalf of the Natural Resources Defense Council (NRDC) and its 1.3 million members and electronic activists, we respectfully submit our written comments in support of the proposed 2013 update to the California Building Energy Efficiency Standards. In summary, we strongly recommend the Commission:

- 1. Adopt without further delay, the proposed Building Energy Efficiency Standards published by the Commission on May 15, 2012, and*
- 2. Finalize in a timely manner the Commission's parallel proceeding on acceptance testing.*

Below we provide additional background on the proposed 2013 standards and its benefits, and recommendations regarding the acceptance testing proceeding.

BACKGROUND AND SAVINGS

It's critically important to construct our buildings properly the first time as the decisions that are made during design and construction can impact the energy use and operating costs of a building for 30 to 50 plus years. For example, it's much more expensive and complicated to add more insulation or switch to more energy efficient windows several years after a building has been constructed.

Upon adoption the proposed 2013 code will ensure that new residential and commercial buildings and major retrofits/additions in California will continue to be among the most energy efficient in the nation. Per CEC estimates, the standards will cut energy use in: new homes by 25%, commercial buildings by 30%, and low rise multi-family homes by 14 %.

These savings numbers are unfortunately lower than the levels initially proposed by the CEC for new single family and low rise residential buildings in its March 2012 proposal (“45 day language) and considerably lower than some of the proposals that were discussed during the proceeding that would have cost effectively delivered up to 41% savings for new homes. These reductions represent a significant missed opportunity and will require even larger savings in the 2017 and 2020 code updates in order for the state to meet its Zero Net Energy (ZNE) goal by 2020.

Given the rapid growth of low rise multi-family homes and apartment buildings in California and the comparatively small savings achieved in the 2103 update for this part of the market, we urge the Commission to pay particular attention to this segment in the next code cycle.

Nevertheless, the proposed standards as drafted will provide substantial cumulative benefits¹ over the next 30 years and warrant prompt adoption. These include:

- Avoid the need to construct 6 or more large (500 MW) power plants
- Prevent the emission of several million tons of CO₂, the main pollutant responsible for climate change.
- Save building owners and tenants billions of dollars in the form of lower electric and natural gas bills.

ACCEPTANCE TESTING

For an energy code to be successful and to deliver real savings, the buildings must not only meet the requirements on paper but the proper equipment and systems must be purchased and properly installed. The proposed code includes updated requirements for acceptance testing. In other words, complex systems such as central heating and cooling systems, lighting and controls in office buildings, etc must be inspected after installation to ensure they were properly installed and working properly.

As there was not broad consensus on who should be allowed to do this verification testing and what the tester’s qualifications/training should be, the Commission opened a parallel proceeding to work out the details. NRDC supported this approach and we participated in the Commission’s workshop on this topic. Our recommended proposal included the following key elements:

1. The individual/firm doing the acceptance testing must be independent and shall not be the designer, specifier, installer, or manufacturer of the equipment/system being tested.

¹ As the CEC has not yet recalculated or published final savings numbers since publication of the 45 day language, we are only able to provide order of magnitude savings numbers.

2. The CEC should establish minimum qualifications and/or training requirements for the individual/firm performing the acceptance testing.
3. The CEC should leverage, but not restrict, qualification to some of the existing certification systems that are already in place in the state.

We urge the CEC to continue its work on this proceeding and to complete it on a timely basis.