

**Energy - Docket Optical System**

TN 72322

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**From:** Brian Selby [brian.selby@benningfieldgroup.com]  
**Sent:** Thursday, October 31, 2013 4:54 PM  
**To:** Energy - Docket Optical System; Nguyen, Le-Quyen@Energy  
**Cc:** Lynn Benningfield  
**Subject:** docket number 06-NSHP-1 Staff Draft of the New Solar Homes Partnership Guidebook

**Categories:** Ready to Docket

To Whom It May Concern:

I am writing this letter to urge the commission to consider revisions to Docket #: 06-NSHP-1 "Staff Draft of the NSHP Guidebook" in the following areas:

Page viii –States:

*Tier I and Tier II projects that comply with the 2013 Building Energy Efficiency Standards and provide compliance documents signed by a certified energy analyst (CEA) certified for the 2013 Building Energy Efficiency Standards will have the NSHP plan check requirement waived.*

I understand the necessity to decrease the processing time and expense for NSHP projects; however, I believe waiving the plan check requirements for CEAs certified for the 2013 Standards is a mistake. Although the intent of the new CEA certification is to increase compliance with the standards by relying on CEAs to provide accurate, complete, and professional compliance documentation, this certification was not intended to replace the plan check process for above code incentive programs. Plan checking provides an essential feedback loop that ensures continuous improvement in energy code compliance.

Page 20 - "2. Code-Compliant Energy Efficiency and Third-Party Field Verification Requirements" States:

*The documentation author for the Title 24 compliance documentation may be any person legally authorized to sign these forms. Applicants will not be required to submit a construction plan set with their reservation application nor have a NSHP plan check completed prior to receiving a reservation.*

I recommend changing this requirement to read:

*"The documentation author for prescriptive Title 24 compliance documentation may be any person legally authorized to sign these forms".*

I believe the prescriptive approach would better suit this application of the requirement. The performance approach requires a more in-depth knowledge modeling software. There are too many variables that could have a negative effect on the accuracy of the model. The prescriptive approach is less technical, does not require advanced modeling knowledge and make plan checking easier.

Page 22 – "4. NSHP Plan Check Requirements" States:

*All NSHP projects will be required to have a NSHP plan check conducted unless they fall into one of the following categories:*

- *The project is applying for the Code-Compliant incentive.*
- *The project meets the Tier I or Tier II NSHP energy efficiency requirements under the 2013 Building Energy Efficiency Standards and has Title 24 compliance documentation completed by a CEA certified for the 2013 standards.*
- *The project is participating in a utility new construction energy efficiency program.*

I recommend changing these requirements to read:

- *The project is applying for the Code-Compliant incentive using the Prescriptive approach.*
- *The project is participating in a utility new construction energy efficiency program.*

Thank you for allowing Benningfield Group, Inc. to review the NSHP Guidebook and provide you with our recommendations.

Sincerely,

Brian Selby

*Director of Energy Efficiency Services*

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