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California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512 Re: Docket #06-NSHP-1

To Whom It Concerns:

On behalf of the 2013 Board of Directors of CABEC, I respectfully submit the following feedback with respect to your references to CEPEs, CEAs, and the waiving of plan check requirements included in the New Solar Homes Guidebook, Seventh Edition.

You are probably aware that (due to delays in the approval and release of EnergyPro 6.0) the first Certified Energy Analyst (CEA) exams for the 2013 Standards are scheduled to be administered in June or July of 2014 for Residential and August or September of 2014 for Nonresidential. This will allow ACM software users time to learn either the CBECC program or EnergyPro 6.0 prior to taking the exam. This will likely mean that the first 2013 Residential CEAs will be listed in a roster on our website in August or September, and 2013 Nonresidential CEAs should be listed by October or November of next year.

For at least the next year, there will be no 2013 Certified Energy Plans Examiner (CEPE) certifications available. It is possible, depending on funding decisions made by the Statewide Codes and Standards Team, that a 2013 Standards CEPE exam will be developed for plan checkers and plans examiners, but at best, this will be after 2014.

CABEC has gathered a document summarizing the NSHP Guidebook references to CEPEs, CEAs, and plan check recommendations. This document, with edits tracked and highlighted portions, is being submitted to the Commission, with our recommended edits in red, and the areas where the NSHP plans to waive plan checking highlighted in yellow.

The Board strongly recommends that NSHP <u>not</u> waive plan check, except in very specific instances. Instead they endorse plan check requirements for <u>any</u> energy efficiency based incentive premium in NSHP. Plan check and correction of inevitable errors is an important piece of the continued and future success of this valuable program.

A "compromise" proposal might be to require NSHP plan check for all Performance based applications, but waive the NSHP plan check for Prescriptive applications. This would not waive the Building Department's responsibility to check those plans.

Please feel free to give me a call if you want to discuss this at any point.

Thank you for allowing CABEC to review the NSHP Guidebook and provide you with our recommendations.

Kim Coolbaugh CABEC Executive Director