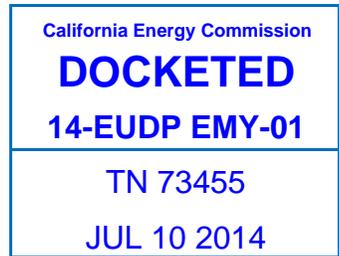


Energy - Docket Optical System

From: Mark Estes [mestes@asantesolutions.com]
Sent: Thursday, July 10, 2014 4:22 PM
To: Energy - Docket Optical System
Subject: docket No 14-EUDP-EMY-01

Categories: Follow-up



I oppose the adoption of the Emergency Regulations to Amend Nonresidential Energy Use Disclosure Program Compliance Schedule in 20 California Code of Regulations Section 1682(c).

While the commission claims to have received extensive information from stakeholders, I do not believe that they have received balanced input and that the input they received does not accurately reflect the situation at hand. By delaying any communication on this issue until July 2nd, there was little to no chance for those who disagree to have a chance for significant input. The commission has not proactively sought to assess the situation in has instead chosen to listen only to those who complain. The docket does not provide any specific reasons beyond "received extensive information from stakeholders indicating that there are significant barriers to compliance with the Program." I recommend that the commission publically identify these 'barriers' and verify if in fact the complaints are legitimate. I believe that you will find that most if not all do not hold up to scrutiny. By not listing them, you give no opportunity for rebuttal. This is poor form. I expect more from my government. More for my tax dollar. You give the impression of being in the pocket of those who oppose ab1103.

The delay proposed by the commission is in a knee-jerk reaction to a few squeaky wheels. Frankly, this is not how to manage a program and the commission should be focused on an impartial assessment of the situation and on a communication program that sorts out fact from fiction for the stakeholders and on enforcement. The energy star reporting system works, the utility downloads are functional. There is no rational reason to delay.

Allowing this delay will confuse the situation further and is likely to lead to reduced compliance in buildings above 10000 ft².

Allowing this delay will cause economic hardship to the companies that have evolved to offer compliance services to those effected by AB1103. This delay is a job killer for those people. I do not believe that job destruction to appease a few squeaky wheels is in the interest of the state, or the people you serve (the taxpayers).

Therefore, I strongly suggest that the commission not adopt the delay and focus their energies on improving the stakeholders understanding and on enforcement which appears to be completely lacking thus far.

Mark Estes,
California Resident and Tax payer, (i.e. your boss)

Cell: 805-766-0137