

RTE

6015 Bear Creek Court
Elk Grove, California 95758
(916) 684-6687 (877) 769-1667 (fax)

November 24, 2014
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

14-BSTD-01

TN 74058

NOV 25 2014

Subject: Multiple Forms, Certificates and Data Registration Complaints

Concern has been expressed by the construction industry, design professionals and building officials that the number of forms, their complexity and data registration requirements have created confusion and delays when preparing and monitoring implementation of the 2013 Energy Standards.

Some of the concerns are valid, but many are just a reflection of the significant changes that occurred in the 2013 standards and should be expected. The number of forms have increased significantly, and at times it is difficult to determine which forms are necessary for both residential and non-residential projects, but these issues could be addressed in a myriad ways ranging from simple flow charts to automated Acrobat forms that allow users to describe their project and use this information to generate a list of required forms. The actual Certificates could also be converted to dynamic forms allowing them to adjust in size and complexity based on the project requirements. This approach would significantly reduce the number of actual forms. Dynamic forms could also include built-in verification to prevent common errors. Where simple projects don't warrant the development of dynamic forms paper forms would still remain available for water heater replacements, windows replacements, small additions with no HERS measures, etc.

The challenge is not the increase in the number of forms or the complexity of the new regulations, but in the perception of significant code changes and lack of simple tools to assist the industry in implementing requirements without reading hundreds of pages of code and compliance manuals. Many of the small contractors and owner-builders want to comply, but they need a simple solution.

Changes are necessary, but the solution is not eliminating forms and requirements, but in making them more efficient and easy to use and understand.

Much of the automation could be integrated into the current HERS data registries and in future non-residential data registries. The primary difficulty with the current data registries reside in the complexity of validating signatures and the need for multiple signatures that prolong the time needed to complete the signature process.

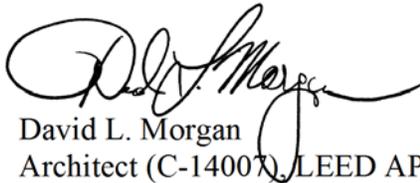
Data registries do not need to be difficult to use or access and the data they can provide would prove invaluable to building officials and the Energy Commission. Data could be immediately available to inspectors in the field. They could determine if Installation Certificates have been completed before they arrive at a site for inspection. Building departments could be advised when all required certificates for a permit have been completed.

Data registries could also provide a warehouse of information the Energy Commission could use to evaluate industry standards and document preferred compliance approaches as well as success failure rates for specific Acceptance and HERS measures.

Concerns expressed by the construction industry are valid, and they need to be addressed by improved documentation and resources provided by the Energy Commission, but it would be inappropriate to reduce the number of forms or eliminate the valuable information available in current and future data registries.

I strongly encourage the Energy Commission to work with the industry participants to upgrade the current forms and documentation to implement improvements in both understanding, efficiency and security. California's energy standards remain the leader in true comprehensive energy savings. The tools and adjustments needed to meet the construction industry concerns are available in various technology solutions today.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Morgan". The signature is fluid and cursive, with a large initial "D" and "M".

David L. Morgan
Architect (C-14007), LEED AP, CEPE, CEA