

Energy - Docket Optical System

From: robert.helbing@gmail.com on behalf of Robert Helbing [bobhelbing@airtro.com]
Sent: Monday, July 01, 2013 11:20 AM
To: Energy - Docket Optical System
Subject: Docket # 12-EBP-1: Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan Staff Workshop

Categories: Ready to Docket

My name is Bob Helbing. I'm President of Air-Tro Heating and Air Conditioning in Monrovia, CA. Air-Tro is a \$9 million/year HVAC business with 70 employees, and was the recipient of the Commercial Contractor of the Year Award from the Air Conditioning Contractors of America in 2011. I am a member of the Western HVAC Performance Alliance, and was the first chairman of the Alliance's NonResidential Quality Installation Committee. I am the current President of the Institute of Heating and Air Conditioning Industries. On a personal note, I am a fourth generation contractor and a third generation engineer, holding a Bachelor's of Science in Engineering from Caltech and registration as a Professional Engineer(Mechanical) in the State of California.

One of the issues that seem to come up during every conversation regarding Title 24 regulations is the issue of compliance. In new construction, compliance isn't much of a problem. A building can't get a certificate of occupancy if it has outstanding building permits, so building owners have a strong motivation to comply with Title 24. When California was predominately a growth state, this focus on new construction was an effective way to promote energy efficiency. But in the last 5 years, California has shifted into a mature rather than a growth economy, with most HVAC activity taking place in the retrofitting of existing structures.

Existing structures already have valid certificates of occupancy. That eliminates a primary driver for compliance by owners and contractors. As a result, code compliance for retrofits is far lower; the presumption throughout the industry is that commercial compliance for retrofit work is somewhere under 2%. Since 2005, when HERS testing became required in California, the Commission has had access to all HERS reports filed in the state, so with the help of a couple summer interns it shouldn't take too long to calculate the actual compliance rate. The results of the exercise would be very informative.

Not only is retrofit compliance much less important, it's also much harder to achieve. One of the major barriers to compliance is the processing overhead called for by Title 24. The 2008 NonResidential Compliance Manual ran 919 pages. The current draft of the 2013 manual now stands at 1464 pages, and my guess is that the final version will be even larger. For new construction, compliance is achieved by design engineers working under the supervision of municipal building plan checkers. For these folks, a code that takes up that much shelf space is challenging, but not impossible. But for contractors and building

inspectors, who have licenses but not engineering degrees, this volume of regulation becomes wholly impracticable. None of us can realistically drag that much documentation onto rooftops where our work is performed and inspected. Fortunately for us, back in 2010 my predecessor as President of the Institute of Heating and Air Conditioning Industries, Bob Wiseman, also President of Canoga Park Air Conditioning, designed the MECH1C-ALT-HVAC form, which condensed those 919 pages into a fairly simple 2 page form. Of the 100 or so commercial retrofits my company does every year, this form works for all but a handful. Thank you, Bob.

2013 has, so far, no ALT form. Instead, the full 60 pages of acceptance, installation and compliance forms are required to obtain a commercial mechanical permit. Frankly, that's more paperwork than I needed to file with the IRS last year. And they expect me to do this only once a year. And I still hire an accountant to do most of the work for me. Asking contractors to fill out this stack of forms is akin to asking them to fill out their tax return in the field, for each and every installation they do. I don't see that as a formula for success.

People don't get into contracting because they are good at filling out forms. If we wanted to do spreadsheets all day, we probably wouldn't pursue careers in the building trades. We are not software people by nature; we actually prefer hardware. We don't sit in offices; we work on rooftops. We don't measure our performance by piles of paper; we measure it by the comfort of our customers.

I urge the Commission to plan a workshop that would include commission staff as well as contractors and building officials. For a change of pace, let's hold this workshop away from auditoriums and conference rooms, and make it a hands on affair in the workspace of inspectors and HVAC contractors. We should start at the Building and Safety Counter of the City of Sacramento, with commission staff showing contractors and the counter staff the new forms and how they are to be filled out. Once the acceptance forms are complete, we would then relocate to a nearby rooftop with a newly installed package air conditioner. Again, commission staff would show what instruments and tools will be needed, and demonstrate how to collect the data required and record it on the installation and compliance forms.

I strongly urge that the commission staff involved be those who designed the forms. This would give them a priceless chance to see how their work actually performs in the field. The insight they would receive, and the comments of the counter staff, the inspectors and the contractors, might inform them about how the forms might be combined or streamlined. Contractors and building officials could see these forms in action, clearing up many of the possible points of confusion. No amount of webinars, bulletins, public hearings or comment periods would be as useful as a day in the field working together. Thank you.

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Robert Helbing
President
(626) 357-5315 x14
www.airtro.com

