



# California Building Industry Association

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| <p>California Energy Commission</p> <p><b>DOCKETED</b></p> <p><b>12-EBP-1</b></p> |
| <p>TN 71572</p> <p>JUL 12 2013</p>  |

In the matter of: )  
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 The Comprehensive Energy Efficiency )  
 Program for Existing Buildings (AB 758) )  
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**Docket No. 12-EBP-1**

California Energy Commission  
 Dockets Office, MS-4  
 1516 Ninth Street  
 Sacramento, CA 95814-5512

Comments submitted on behalf of:

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The California Building Industry Association (CBIA) is a statewide trade association representing over 4,000 member-companies involved in residential and light commercial construction. CBIA member-companies are responsible for over 90% of the new homes built in California each year.

CBIA welcomes the opportunity to submit comments on the CEC's "*Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan*" as prepared pursuant to AB 758 (Skinner). Overall, CBIA is very supportive of the Draft Action Plan and we look forward to working with the Commission on the future implementation of the AB 758 measures.

## **Specific Comments/Suggestions**

### **"Value" of Education and Training**

As noted in our comments at the Workshop in Fresno, there needs to be an established "value" for energy efficiency compliance education and training efforts. For decades, the utility programs overseen by the Public Utilities Commission (PUC) have recognized the value to the ratepayer from increased levels of energy efficiency in residential and commercial construction. While CBIA supports these efforts, the PUC utility program evaluation procedures make the incorrect assumption that all regulations and incentive programs are fully understood, implemented and enforced at the local level, even though there is a wealth of evidence to the contrary.

For example, the CEC's energy efficiency building standards requires duct leakage testing (and potential repair) of an existing home's duct system prior to installation of new air conditioner or heating unit. For the existing housing stock, this is a very reasonable requirement. **If implemented correctly**, the consumer will see significant reductions in the energy needed to cool the home in summer and the ratepayer will see the benefits of this peak load measure on the grid. However, it is estimated that up to 90% of the HVAC change-outs in the LA basin area do not comply with this provision.

There is no question the assumption that all standards and programs are well understood, implemented and enforced is simply wrong and needs to change. Future programs need to include ongoing training and education components which focus on designers, subcontractors, site-superintendents, plan checkers and building officials.

CBIA supports a variety of educational and training efforts wherein the CEC and utilities partner with industry, the California Building Officials, Contractors State License Board, American Institute of Architects and the various sub-contracting organizations throughout the state.

### **Simplify the Regulations:**

The Energy Compliance Manual recently approved by the CEC for use with its residential energy efficiency standards is over 1,100 pages long. Add to that the 200+ page set of standards and the code-user has nearly 7 pounds of regulatory material to become familiar with in order to fully understand and implement the residential energy efficiency standards. While it is understood that the CEC's standards are arguably the most comprehensive set of energy efficiency measures in the nation, the body of CEC-adopted material is simply enormous compared to other code-related subject areas.

Add to this the facts that these regulations are also the most technically complex measures found in California's buildings codes and that the CEC standards change substantially on a regular basis, the argument can be made that significant effort to simplify compliance should be an overriding theme throughout the next 2-3 triennial updates.

### **Access to Utility Billing Data:**

While CBIA understands and appreciates the need for the utility companies to maintain reasonable levels of privacy for their customers data, a lot needs to be done in the area of data retrieval and use. With regards to commercial buildings, CBIA is aware of significant resistance from utilities to provide utility billing data information in the manner and spirit required by the CEC's AB 1103 regulations.

Having access to useable utility billing data is absolutely essential for the potential tenant or owner in making reasoned decisions related to the purchase/rental of existing buildings. In addition, this same information is also an essential component in the process of prioritizing retrofit measures that potentially could be made to the structure.

### **Home Energy Rating System (HERS II) Program:**

To reiterate comments made at the workshop in Fresno, CBIA respectfully suggests the current CEC HERS II approved process and software be updated and simplified. Specifically, the energy efficiency features considered in the "loading order" should include all available, cost-effective residential energy efficiency measures. For example, in California where 2 out of 3 residential dwellings were constructed prior to the implementation of a statewide energy code, window film is one of the most cost effective energy features a homeowner can add to reduce cooling load.

Both the AB 32 Climate Change Scoping Plan and the CPUC's Long Term Energy Efficiency Strategic Plan recommend a 40% reduction in the energy consumption of existing residential buildings by 2020. Updating and simplifying the HERS II process would add a key tool in helping achieve this ambitious goal for residential buildings.

### **Comments Submitted by CBPA and CAR:**

CBIA is in general agreement and supports the comments submitted by the California Business Properties Association and the California Association of Realtors.