



California Energy Commission

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Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan Staff Workshop

Commissioners,

Thank you for holding the Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan Staff Workshops and soliciting public comments.

Simon Baker of the CPUC once said *"What we are looking for is an HVAC energy efficiency program that the contractors will adapt into their businesses and continue voluntarily without the rate payers having to continue to finance it."*

We believe the development and implementation of such programs are possible in the HVAC sector. However such programs represent a significant departure from the existing component-based deemed savings programs typically utilized in California programs today. It is becoming more and evident that the energy savings hoped for and the intended market transformation is not being realized by existing test methods.

The HVAC industry has the ability to measure the operating performance of HVAC systems using proven air balance industry test methods and principles. These principles have been an accepted and specified method of verification for the architectural and engineering communities for many decades.

We urge regulators to move away from sole dependence on building science-based testing methodologies for verifying the performance of HVAC systems and also allow use of HVAC industry accepted HVAC system performance measurement methods.

In the HVAC industry today, there is a large group of qualified industry professionals capable of measuring and verifying the performance of the HVAC systems that they design and build.

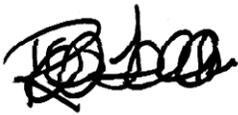
As we look to answer the requests from the CPUC we envision a substantial shift in how energy efficiency is measured in the HVAC industry as a future target. This shift would someday assure energy efficiency programs that the contractors would adapt into their businesses and continue voluntarily. The result would be measured and calculated energy efficiency and would once again instill the confidence of the HVAC industry in regulators.

Benefits of HVAC energy efficiency programs by HVAC professionals for HVAC professionals would:

1. Provide an effective improved business and compliance model for better HVAC contractors to move towards and embrace.
2. Require acceptance by the CEC of new exceptional test methods opening the door to new alternate compliance methods.
3. Be based on the idea that manufacturer's specifications are the foundation of operating system efficiency and that measurement, calculations and verification of these values would confirm acceptable energy efficiency compliance.
4. Someday permit HVAC contractors and other industry professionals to become the responsible party for HVAC efficiency and enabled them to self-verify and document the performance of the HVAC systems they design, build, and commission to meet code compliance.
5. Include HVAC industry training, certification, support needed for each individual in the program to effectively complete his or her roles in the program.
6. Include simple, yet highly effective integrated software tools that would serve all stakeholders at the same time and through natural work processes satisfy each of their needs.
7. Enable contractors to invest in a believable program so they would, increase compliance and provide improved HVAC energy efficiency because:
 - a. Such programs would be of them, by them and for them;
 - b. The cost and work required to comply would be reasonable and the testing and reporting is within their control;
 - c. They can be well paid for measured and calculated energy efficiency;
 - d. They have the opportunity to participate in programs that are simple, inexpensive to administer, and follows their work processes, and test methods;
 - e. It would allow them to identify and deliver HVAC system efficiency that is affordable and reasonable to their customers;
 - f. Technicians and installers would be able to measure and calculate the immediate improvement in energy efficiency their work produces – they could believe that what they do makes a difference.
8. Consumers would benefit by the educational experience that is woven to the program that would drive their purchasing decisions. They would also:
 - a. Receive an effective education during the decision making process about options for increased energy efficiency that meets their budget and desires to improve efficiency;
 - b. Be willing to pay for reasonable and real measured and calculated energy savings;
9. Building Inspectors and officials would:
 - a. Receive an increasing rate of compliance form a group of pre-qualified contractors;
 - b. Be able to receive building permit applications and compliance documents online;
 - c. Be relieved of processing and verifying energy efficiency paperwork;

- d. Be able to return to health and safety compliance inspection and verification.
10. Regulators could benefit from these programs by:
- a. Improved contractor and consumer relations;
 - b. Supporting a core group of contractors that would actively lead the industry towards compliance;
 - c. Supporting a realistic program with the best possible chance of transforming the HVAC industry;
 - d. Having an effective measured and calculated energy efficiency test and verification method;
 - e. Increasing credibility with building inspectors and officials;
 - f. Sponsoring a group making realistic progress towards efficiency and compliance goals and objectives.
11. To be successful these programs would have to remain simple and free from additional layers of bureaucracy and ever increasing burdensome compliance demands.
12. Such programs could apply to residential and commercial systems and also be adapted to new construction projects.

As we hear what you are asking for it is clear that the programs and practices that have been in place are failing to produce the results that you expect. We propose these ideas as seeds for change in the HVAC industry.



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