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July 12, 2013

**California Energy Commission  
Dockets Office MS-4  
Re: Docket No. 12-EBP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512**

California Energy Commission <b>DOCKETED</b> <b>12-EBP-1</b>
TN 71642 JUL 15 2013

Dear Commissioners:

RE: Comments on AB 758 "California Draft Plan of Action

First, we would like to thank the CEC, the other State/Regional Agencies and Stakeholders for their efforts in preparing the California Draft Plan of Action. The task at hand is ominous in size and scope and will require a concerted effort on many fronts to achieve the lofty goals which have been established in AB 758.

After attending/reviewing the presentation provided by the CEC in June, it was reassuring to see that you (CEC) fully understand the many complexities of the legislative goals in AB 758 and have the foresight to identify areas that need further development/refinement in the action plan.

As we desire to help the Citizens of California to achieve energy usage reductions, we submit the following suggestions to help us reach and exceed those goals;

1. During the presentations there were several exchanges regarding whom the public trusted more, the environmentalist or the State. With no disrespect intended, we highly suggest that programs and efforts be marketed based on cost savings from lower energy usage and reduced environmental impact from our "California" life style, which we all wish to maintain. We should avoid the "us against them" that occurs when a program appears to be promoted by a selective group.
2. Discussions about the role of the HERS raters in implementation of the plan stirred concerns of untrained or more accurately, insufficiently trained individuals inspecting or documenting field work that they are not fully competent in.

An example of proper training would be the Spray Foam PCP (Professional Certification Program) for Spray Foam Applicators, Contractors and Inspectors which has been developed over the past 4 years in conjunction with OSHA, EPA,

NIOSH, SPFA, ACC/CPI and other parties. This Professional Certification Program has been developed to ensure that Spray Foam Roofing and Insulation materials are installed in an environmentally sound and safe way to enhance delivery of outstanding “IN PLACE” spray foam performance

The Spray Foam PCP includes a ½ day training course for individuals who inspect all types of Spray Foam. This should be required for anyone who inspects Spray Foam. It is the only Spray Foam Inspecting course I know of that meets the requirements of ANSI 17024 certified training requirements.

3. Many in the audience agreed with Kate Leyden’s, (Executive Director of Valley Contractors Exchange) , comment “Those guys in the trucks are grossly overregulated”. From many perspective’s, we/they are.

Simplification of the process will substantially increase the likelihood that the programs will be embraced by Contractors, Owners and Raters as an IMPROVEMENT over the old way and thereby increase voluntary cooperation and achievement of the goals.

Excessively cumbersome paperwork has driven many great programs to an early demise.

4. We would also like to suggest the inclusion of the “Man/Woman on the Ground” otherwise known as the Contractor, Producer, Installer, Applicator or Inspector. We must include the individuals who are responsible for completing the work and ultimately achieving the goal of reduced energy consumption.

I must say at this point, the term “Stakeholders” as typically used in program development is not what we are suggesting here. The “true measure” of the successful implementation of AB 758 will be “Field-in-place Performance” that results in the reduction of energy consumption on individual residential and commercial structures.

To achieve desired goals, we will need the input of the Contractor to determine cost effective methodology and Trade Associations to further develop enhanced training programs similar to Spray Foams PCP training for all phases of the work. This falls in place with the goal of creating a highly trained “Clean Energy Workforce”.

In closing, we applaud the work you have put forward in developing the draft plan and we stand ready to aid California in achieving the Net Zero Energy Goals we have established with highly trained professional Spray Foam Applicators and Contractors.

Respectfully submitted,

Lyle Orth

Lyle Orth

President CSFA

Common Sense Solutions, Inc. DBA Cool-Roof Systems

Jim Francisco

Executive Director

California Spray Foam Assoc.

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