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California Energy Commission
DOCKETED
12-EBP-01
TN 71528
JUL 05 2013

July 5, 2013

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

Dear Commissioners:

Thank you for the opportunity to comment on the Draft Action Plan for the Comprehensive Energy Efficiency Program for Existing Buildings. We appreciate the work involved in this draft, and applaud your recognition of the gaps, realities and complexity. We also appreciate that you held three meetings for public comment and that those meetings were webcast. It was helpful to hear comments from so many in the construction industry.

My first comment is this: when looking to connect with contractors, remember California's Builders Exchanges. In Central and Northern California, there are over 20 local Builders Exchanges with combined membership surpassing 10,000 companies. Member companies are union and merit-shop, generals and trades, suppliers and professionals. Plenty of us represent rural populations where over 95% of our local licensed contractors either work solo, or have less than 5 employees. Our member-operated non-profits provide members with access to jobs out to bid and information on construction safety, regulations and local opportunities. Many of us are listed at www.gsbe.net.

My second comment is this: Commissioner McAllister was spot-on when he said: *It's the guy in the truck that will make this happen.* Many comments made on the draft by statewide contractors are the same that I have heard from our local contractors. In particular:

- If a customer can't justify the cost of an energy efficiency improvement, they won't do it.
- Energy efficiency requires marketing that is unlike contractors' usual marketing.
- The process must be simplified. The codes, the modeling, the verification, the cost, the permitting, the rebates, the certifications.

Success will require pragmatic and cost-effective practices. What may appear as taking a step backward will prove to be the only way to make steps forward.

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Finally: those guys in trucks are grossly overregulated. While Builders Exchanges watch Energy Commission action on AB758, Prop 39, Renewables, Title 24/Part 6, HERS and AB 1103, we are also watching the other agencies that regulate contractors: ARB, BOE, BSC, Caltrans, CSLB, DAS, DGS, DLSE, DOI, DOSH, DSA, DTSC, DWC, EDD, HCD, OSHPD, SFM, SWRCB and the Governor. Plus cities, counties and local agencies. If you feel like you can't get contractors' attention, it's because there's a long line of rules and regulations ahead of you.

Again, thank you for the opportunity to comment, and to hear the three days of public comments. Working together, contractors can make homes and buildings comfortable and energy efficient, at reasonable cost.

Sincerely,

Kate Leyden

Kate Leyden
Executive Director
Valley Contractors Exchange