DOCKET
08-HERS-1
DATE AUG 24 2008
RECD. AUG 25 2008

Pacific Gas and Electric Company®

August 24, 2008

Helen Lam
California Energy Commission
Buildings and Appliances Office
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Re: Docket Number 08-HERS-1 –California Home Energy Rating System Program

Dear Ms. Lam and CEC staff:

On behalf of the Pacific Gas & Electric Company Codes and Standards program, we would like to voice our support for the proposed Phase II updates to the California Home Energy Rating System (HERS) Program along with recommendations for additional modifications. PG&E recognizes that the current housing of stock is approximately 70 times larger than the annual increment of new dwelling units. Thus deep reductions in the energy consumption of the existing building stock are a necessary pre-condition of meeting the building sector efficiency goals of AB 32 (1990 emission levels by 2020)[1] and are an important component of the California Energy Efficiency Strategic Plan endorsed by all of the California IOUs.[2]

HERS regulations for existing housing will provide a repeatable, verifiable and substantively accurate method of benchmarking the energy efficiency of residential buildings and identifying energy efficient opportunities.. Hence, they will also support retrofit programs implemented by California IOUs for improving existing home energy efficiency.

We have the following comments in response to this proposal and comments from other stakeholders:

- **Retain the Standard Approach**. Some have argued that a HERS report containing both Standard Approach recommendations and Custom Approach recommendations would create a confusion in the market. We think the Standard Approach is needed for several reasons including:
    1. **Consumer Protection.** Since the HERS rater or building performance contractor has a high level of control over the ranking of measures in the

[1] AB 32, Nunez. Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006

[2] Section 2 –Page 17. *"Goal 2: Transform home improvement markets to apply whole-house energy solutions to existing homes."* **Attachment A, California Longer Term Energy Efficiency Strategic Plan: Achieving Maximum Savings in California for 2009 and Beyond**. August 2008. http://docs.cpuc.ca.gov/efile/PD/86800.pdf

Custom Approach, the concern is that the Custom Approach report might tend to yield window replacement recommendations for window companies, HVAC replacement for HVAC companies, etc. With Standard Approach recommendations for comparison, the consumer can compare the recommendations from the two approaches and make an informed decision.

2. **National consistency.** The compatibility of the Standard Approach with national rating standards is desirable so that energy efficiency upgrades can qualify for national programs including Federal tax credits, energy efficiency mortgages etc.

- **Update Standard Cost Models.** Though the costs from the DEER database have been vetted, we know that there is room for improving the accuracy of estimating retrofit costs that will likely vary by geographical region and economic conditions. Thus updating the cost models that underlie the ranking of measures in the Standard Approach recommendations is essential to retaining consumer and rater confidence in the Standard Approach method.
- **Add Swimming Pool and Spa calculations to the HERS model.** On average filtration of swimming pools consume approximately 3,200 kWh/yr of electricity[3] and 225 therms per year of natural gas.[4] In comparison, the entire energy consumption of homes is approximately 6,200 kWh/yr and 440/therms per year.[5] Thus for homes with swimming pools, the error generated by leaving out the pool energy consumption is large and undermines consumer confidence in the report. In addition, many of the swimming pool measures have large energy savings and are very cost-effective. Adding pool and spa energy efficiency recommendations would provide significant value for the 700,000 homes with pools.

Sincerely,

Pat Eilert & Charles Segerstrom, Pacific Gas & Electric Company

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[3] PG&E and Southern California Gas 2007. **Draft Report Residential Swimming Pools**, Codes and Standards Enhancement (CASE) Initiative Report.

[4] California Statewide Residential Appliance Saturation Study.

[5] ibid