

Comments to the NSHP GuideBook

DOCKET	
06-NSHP-1	
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RECD.	OCT 13 2006

General Comments

1. Both Tier I and Tier II indicate that the building achieve 15% or 35% reduction in energy use from the *2005 Title 24 Standards*. Will this remain the goal when the *2008 Title 24 Standards* are implemented? Or will it move to 15% /35% above the 2008's?
2. Tier II requires high efficacy lighting and ES appliances. Even though these could be inspected by the jurisdiction, I think they could be HERS inspected.

Reservation Comments

1. I think the checkpoints should vary, based on the amount of commitment or actual progress the builder starts with. For instance, if Tentative Map, then there should be shorter term progress checkpoints. Maybe check on progress on getting to Final Map (this could drastically effect orientations, since streets, layouts, cul-de-sacs, etc. can be altered during this process. A "conditional" map should be reviewed to see if any of the conditions effect the solar program.
2. If the builder is more substantially along the way, and is actually building, then 12 month should be adequate.
3. An incentive to builders to actually build the houses with the solar installation when they are only offering it as an option might be to extend the reservation time of \$ when the builder will spec houses that may be in his inventory for a while, but he will hook up to the grid and give power to the IOU. Maybe he could get other refunds for his infrastructure, or credit against infrastructure costs on other subdivisions. There could potentially be a lot of free power sitting around this way.

Energy Efficiency Documentation (Very Important) - page 15

1. CF-1R must be given to the Provider in digital format directly from the compliance software. This is so Provider can ensure that the lots he is certifying were qualified. Do not allow "comparable documentation" this will allow a lot of Title 24 analysts to refuse to submit the documentation, and then it gets transcribed by unqualified people to be submitted or reviewed. This causes all kinds of problems now, and is allowing T24 analysts to dodge responsibility and consequences of incorrect calcs.

Field Verification – page 7

1. I recommend NO SAMPLING. Since the HERS cost is such a small amount of the total cost installation, I think the "cost effectiveness" of the HERS testing has been demonstrated. I also feel shading, mature tree height are especially necessary to actually visualize on each installation. Output and other things

- should be actually documented in a database for CEC and others to compute actual Kwh savings. Maybe it should be required as a matter of course.(?) I do not even see how sampling could account for that inspection.
2. IF you do allow sampling, then the sampling paragraphs in the ACM should be re-written, since they were written without contemplating the solar program. It is already evident that they do not properly address Alterations and new construction separately, so tying sampling to those paragraphs is going to leave a large grey area and allows too much interpretation.
 3. For determining azimuth, compasses can cause problems, and a person would have to use the proper correction for magnetic north. Would the CEC publish magnetic deviation tables? Another way to get the azimuth is by measuring two points from property line to the house, and using Pythagorean theorem and tangent function, the actual angle of deviation from the property line can be calculated.

Rebate Payment Claim Form NSHP-2 (Very Important)

1. This form should require a Provider's Certificate Number to insure that all data gets into Provider's databases. NO hand written stuff, and do NOT rely on sign off of building permit, as this is very unreliable.