

12/23/07

To: California Energy Commission

From: Jay Salazar, City of Vacaville

Re: Comment RE: 45-day language review - HERS procedures and documentation - ADMINISTRATIVE REGULATIONS
CALIFORNIA CODE OF REGULATIONS TITLE 24, PART 1, Section 10-103

3. Installation Certificate and Certificate of Acceptance.

A. Installation Certificate. For all low-rise residential buildings, The person with overall responsibility for construction or the person or persons responsible for the installation of regulated manufactured devices regulated by Part 6 or the Appliance Efficiency Regulations shall submit a copy of the Installation Certificate(s) to the enforcement agency for filing with the building plans. Alternatively, the enforcement agency shall authorize the submittal of the Installation Certificate(s) for retention to a HERS provider's data registry. These filings may be paper or electronic documents. A copy of the Installation Certificate(s) shall be posted, or make made available with the building permit(s) issued for the building...

[Note: Similar language occurs throughout Section 10-103.]

Comments:

Filing with what building plans is an unfunded mandate that adds additional record keeping costs to local cities for no proven energy benefit. Please demonstrate through objective testing that this additional item will gain additional compliance and to what degree the item will provide additional compliance.

What happens when the documents are lost after filing? If nothing, then why have the requirement? This requirement creates bigger government for no demonstrated energy benefit.

There is no purpose for filing anything with building plans if certain aspects of the energy standards are already required to be on the plans.

The installation certificate should be retained solely by the commission or provided to the purchaser of the property.