

HERS Raters and Interested Parties



In an earlier announcement we notified you that the CEC had removed HERS verification of the performance of PV systems from the proposed 2019 code language, despite it being specifically recommended by the original CASE study that justified essentially making PV systems mandatory in all new construction. The CEC was relying on building departments to verify the performance of PV systems, rather than HERS raters. Many of you wrote in to the

CEC. Thank you for that. Only one party wrote in support of the CEC's proposed language.

We just received the CEC's final determination on this topic. They have decided to rely on neither HERS raters or building departments for this energy feature. They believe that the self-monitoring requirements will ensure proper performance.

Here is what the CEC told us:

"Our conclusion is that PV systems are different from other building systems, such as HVAC equipment, insulation, and water heating distribution systems, in a way that they are very visible systems that come with a robust life-time monitoring system that allows the building occupants monitor and detect any problems with their PV systems, and report the issues back to the builder/installer so they can correct the problems. Other building system generally do not have this capability at this time. This is somewhat similar to the fault detection technology for the HVAC systems.

Also, in our conversations with the builders and installers, they indicated that the builders and installers have a vested interest in making sure that the systems are installed and operated properly, in large part because of the ability of the occupants to monitor the performance of their own PV systems. Also, many systems that are leased come with performance guarantees and the builder/installers have an interest in making sure the system is operating properly.

Therefore, we do not see a need for either the building departments or the HERS raters to spend resources on this measure. In the future, if the evidence indicates a need for a different course, such as HERS involvement, we can reconsider the issue at that time."



The Docket for the 2019 Standards is still open for comment if you want to submit a response. Email your comments in PDF format to Docket@energy.ca.gov. Be sure to include the phrase "Docket #17-BSTD-02" in both the subject line of your email and the heading of your letter.

If you have any questions or concerns, please contact field@calcerts.com or call 916-985-3400 #.