

Comment #	PA(s)	Sector	Page #	Comment
NRDC -1	SW C&S Team	C&S	General	<p>Observing that pre-emption is more likely moving forward making it more challenging to reach our 2x EE goal, we recommend the following:</p> <ul style="list-style-type: none"> • Explore with the CEC how to increase investment in personnel to work on C&S given the likelihood of additional pre-emption in the future. Without additional staff and resources, it will be harder to reach a doubling of EE by 2030. • Work with the CEC to ensure appliances that currently don't get credit in T24 compliance are integrated into the forthcoming Cal-HERS development.
NRDC-2	SW C&S Team	C&S	p.3	<ul style="list-style-type: none"> • P. 3-5 – Why is it only PG&E? Suggest all PAs would be a part of code readiness. • In addition, shouldn't code readiness include making sure new codes don't continue to create the gap/stranded potential, which would involve stronger connections to programs to prep for the transition? This was brought up by ORA at the C&S subcommittee and I recall one response was that there would be programs to prime the market for the forthcoming codes so future code cycles don't have such a large gap. It's not clear how that will happen. • P.24 – suggest linking/providing a crosswalk for these efforts to clearly show how the sector strategies provide an opportunity to prime the market.
NRDC – 3	SW C&S Team	C&S	p.6 and p.21 re: new tools	<ul style="list-style-type: none"> • P.6 – has there been any evaluation that identified the difficulty that building inspectors have to process code compliance? Or additional tools to use? There have been many anecdotes, but did not see reference to such findings in the EMV section. • P.21 includes an electronic approach to collect data to analyze, but would it also encompass new technology to make building inspectors' jobs easier onsite?
NRDC – 4	SW C&S Team	C&S	p.14	<ul style="list-style-type: none"> • Suggest intervention 1 should include a proposal to do a CASE on simplifying the code if the C&S team thinks the code could be simplified. Martha Brook provided that example as an option during one of the CAEECC meetings. • What does "internal stakeholders" mean?
NRDC – 5	SW C&S Team	C&S	p.10 p.16	<ul style="list-style-type: none"> • Suggest inserting a specific strategy on p.16 to address the MEL problem identified on p.10 as requiring "different paths to transform the market for MELs with a shorter product cycle, in addition to supporting new appliance standards." • We recommend inserting the following on p.16. "Include innovative non-regulatory standards for certain MELs, when those can provide higher and faster savings than the conventional Title 20 approach." Pursuing both regulatory and non-regulatory standards would help scale up energy savings from appliances.

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Date: 11/21/16

NRDC-6	SW C&S Team	C&S	General	<ul style="list-style-type: none">• How will the C&S team coordinate with other entities to reduce potential for duplication? E.g., especially with BayREN/PG&E territory overlap re: training and other enforcement improvement activities?
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