

RTR Appendix

Southern California Edison, Pacific Gas and Electric, Southern California Gas, and San Diego Gas and Electric (“Joint Utilities” or “Joint IOUs”) developed Responses to Recommendations (RTR) contained in the evaluation studies of the 2013-2015 Energy Efficiency Program Cycle. This Appendix contains the Responses to Recommendations in the report:

RTR for the Codes and Standards Compliance Improvement Program Years 2013-14 Process Evaluation Final Report (DNV GL, Calmac ID #CPU0129.01, ED WO #ED_D_CS_3)

The RTR reports demonstrate the Joint Utilities’ plans and activities to incorporate EM&V evaluation recommendations into programs to improve performance and operations, where applicable. The Joint IOUs’ approach is consistent with the 2013-2016 Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan¹ and CPUC Decision (D.) 07-09-043².

Individual RTR reports consist of a spreadsheet for each evaluation study. Recommendations were copied verbatim from each evaluation’s “Recommendations” section.³ In cases where reports do not contain a section for recommendations, the Joint IOUs attempted to identify recommendations contained within the evaluation. Responses to the recommendations were made on a statewide basis when possible, and when that was not appropriate (e.g., due to utility-specific recommendations), the Joint IOUs responded individually and clearly indicated the authorship of the response.

The Joint IOUs are proud of this opportunity to publicly demonstrate how programs are taking advantage of evaluation recommendations, while providing transparency to stakeholders on the “positive feedback loop” between program design, implementation, and evaluation. This feedback loop can also provide guidance to the evaluation community on the types and structure of recommendations that are most relevant and helpful to program managers. The Joint IOUs believe this feedback will help improve both programs and future evaluation reports.

¹ Page 336, “Within 60 days of public release of a final report, the program administrators will respond in writing to the final report findings and recommendations indicating what action, if any, will be taken as a result of study findings. The IOU responses will be posted on the public document website.” The Plan is available at <http://www.energydataweb.com/cpuc>.

² Attachment 7, page 4, “Within 60 days of public release, program administrators will respond in writing to the final report findings and recommendations indicating what action, if any, will be taken as a result of study findings as they relate to potential changes to the programs. Energy Division can choose to extend the 60 day limit if the administrator presents a compelling case that more time is needed and the delay will not cause any problems in the implementation schedule, and may shorten the time on a case-by-case basis if necessary to avoid delays in the schedule.”

³ Recommendations may have also been made to the CPUC, the CEC, and evaluators. Responses to these recommendations will be made by Energy Division at a later time and posted separately.

Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies

Study Title: Codes and Standards Compliance Improvement Program Years 2013-14 Process Evaluation Final Report

Program: Codes and Standards

Author: DNV GL

Calmac ID: CPU0129.01

ED WO: ED_D_CS_3

Link to Report: http://www.calmac.org/publications/ComplianceImprovementImpactEvaluationDraftReport_FINAL-OUT.pdf

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| 1a | 66 | <p>The IOU CI program trainings were a series of role and/or project based trainings that were well received by participants. The strength of the ECA trainings was that the information provided on the energy code was comprehensive. Participants reported the trainings served to provide a knowledge base on the energy code, provided practical information on how to find out more detailed code information, and provided take home materials to use as an ongoing resource.</p> <p>The trainings could benefit from three measures:</p> | <p>1. Provide more focused trainings: Our findings indicate that participants find value in the ECA trainings. However, while the trainings provide a lot of information on broad aspects of code compliance and build knowledge of the energy code, they may not be leading to improved code compliance. All market actors, especially plan checkers and building inspectors, have limited time available per project to focus on energy code. We recommend that the IOUs, perhaps in conjunction with BayREN, work to identify areas of the code that are most vulnerable to noncompliance. We suggest the IOUs develop focused, targeted trainings that address these areas of the code to both the supply side (building department staff) and the demand side (building industry members). Specifically, the IOUs should consider trainings that aim to:</p> <ul style="list-style-type: none"> a. Simplify the code for building industry members and provide trainings that are applicable to targeted groups (i.e. electricians that focus on residential improvements). b. Maximize building department members time effectively <p>The trainings should be hands-on and offer instant feedback for sample projects, identify common pitfalls, and provide examples of compliant and non-compliant projects. These trainings should be updated frequently as needs of building department and industry change.</p> | All IOUs | Accepted | <p>We agree completely with the recommendations of simplifying the code for building industry members, maximizing building department members' time-effectiveness, and focusing on hands-on activities with immediate feedback for sample projects.</p> <ul style="list-style-type: none"> • The current courses for Plans Examiners and Building Inspectors (PE & BI) include multiple "hands-on," case-study based activities using the sample projects and the relevant Plans Examiner Checklist and Building Inspector Checklist (developed by ECA and approved by the Energy Commission), which are designed to focus attention on key aspects of determining a project's compliance with Title 24, Part 6. <p>In addition, case study materials for the Nonresidential PE & BI course include the updated NRCC-PRF-01 form. The ECA team worked with the Energy Commission, the association of California Building Officials' (CALBO's) Energy Committee and various building departments throughout the state to update this Certificate of Compliance to make the form easier to read and use (now only the PRF version of the form must be submitted for a project instead of the PRF along with Prescriptive forms for the project) and to include a chart highlighting the "high-value" measures for a given project, and which is customized based on the project's compliance strategy.</p> <p>The updated form makes plan checking faster and easier, and in our classes, plans examiners get practical experience using the project-specific energy use chart to prioritize their time based on the "high-value" measures in the project.</p> <ul style="list-style-type: none"> • The current courses for Energy Consultants, Designers and HVAC contractors also include multiple "hands-on," activities based on sample projects that parallel participants' on-the-job responsibilities related to compliance with Title 24, Part 6. • Later this year (2016), we plan to further refine all of these courses to minimize the presentation time and focus more on activities using ECA tools and resources (Forms Ace, Reference Ace, Checklists, Fact Sheets, Trigger Sheets, etc.) to direct their on-the-job efforts and to complete their compliance-related responsibilities as time-effectively as possible. • Additionally, we have expanded our online course offerings to better help participants use time effectively, allowing them to take classes when and where they prefer. (See our response to the recommendation to "Expand online trainings" for more detail.) |

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| 1b | 66 | | <p>2. Expand online trainings. Users were very satisfied with the online trainings that were offered by ECA as described in previous sections. The evaluation team recommends offering more of the Title 24 Essentials training series online, especially the trainings targeted to the building industry, who are less likely to come to classroom training. Further, users stated they wanted more examples and “how-tos.” The online platform could provide great resource for short videos on how to fill out specific energy code forms, how to navigate the ECA website, and how to ensure proper installations of energy efficient equipment.</p> | All IOUs | Accepted | <p>We agree that online offerings are especially effective in reaching busy professionals and those who are located in more remote areas.</p> <p>We currently have two major types of online training:</p> <ul style="list-style-type: none"> • “Virtual classes” (v-classes) are live, online instructor-facilitated training that parallel the kinds of activities incorporated in our traditional classroom training (individual and small-group “hands-on” activities based on typical “real-world” situations). We currently offer V-class formats of the following Energy Code Ace Title 24 Part 6 Essentials classes: <ul style="list-style-type: none"> o Residential Standards for Energy Consultants o Nonresidential Standards for Energy Consultants o Residential Modeling o Nonresidential Modeling o Standards for Refrigeration in Retail Food Storage • Online self-study courses are on-demand training that people can complete at their own pace at their convenience. We currently offer online self-study formats of the following Energy Code Ace Title 24 Part 6 Essentials classes: <ul style="list-style-type: none"> o Residential Standards for AC Quality Installation Contractors o Residential Standards for Indoor Lighting o Residential Standards for Ventilation o Nonresidential Standards for Indoor Lighting Mandatory Measures o Nonresidential Standards for Indoor Lighting Prescriptive Compliance <p>We are currently developing a series of “blended learning” opportunities that use a combination of traditional classroom training, v classes, and online self-studies—supported by personalized mentoring opportunities—to do a deep dive on key facets of compliance and to help energy consultants build the skills and knowledge associated with achieving Certified Energy Analyst (CEA) status.</p> <p>Our plans for next year (2017) include producing more interactive online self-study courses targeted to building professionals, focusing on how to perform their role-specific responsibilities related to Title 24 Part 6.</p> <p>We also agree that videos can be an effective teaching tool, and we have added one on the ECA site and its offerings. The Energy Commission’s online resource center (ORC) includes many videos on Title 24 compliance and there are plans to add more. ECA coordinates closely with the Energy Commission to ensure we are cross-promoting resources and not duplicating materials and efforts.</p> |

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| 1c | 66-67 | | <p>3. Improve the reach of the trainings through strategic partnerships. The IOUs should partner with code related organizations to provide links to the ECA training website. As knowledge of the energy code spreads, the time it takes for permit applicants and issuers to fill out and process forms will decrease. One theme that emerged from web survey respondents was that the building department staff spends a significant amount of time explaining codes and standards requirements to permit applicants. The CI programs should aim to increase their reach with strategic partnerships in industry and equipment distributors. They should also leverage partnerships with local governments and encourage them to use resources and trainings available to permit applicants. The IOUs should consider the possibility of offering trainings that qualify for continuing education credits to further broader reach.</p> | All IOUs | Accepted | <p>ECA strives to dramatically improve compliance with Title 24, Part 6 and Title 20 by working with industry stakeholders to understand their code compliance barriers and implementing solutions designed to address key market actors' specific job tasks and needs. We understand the critical importance of strategic partnerships with key stakeholders to achieving our goals, and have successfully built and strengthened relationships with such organizations as the Energy Commission, CALBO, County Building Officials of California (CBOAC), International Code Council (ICC), California Association of Building Energy Consultants (CABEC), American Institute of Architects California Council (AIACC), United States Green Building Council (USGBC), Association of Energy Engineers (AEE), Construction Specifications Institute (CSI), Institute of Heating and Air Conditioning Industries (IHACI), American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), California Lighting Technology Center (CLTC), International Association of Lighting Designers (IALD) and the Illuminating Engineering Society (IES), and the local chapters of these associations across California. We have also broadened our reach to local governments through such endeavors as the Statewide Energy Efficiency Collaborative (SEEC) and the IOU Local Government Partnerships.</p> <p>ECA outreach activities include fostering relationships with these and other organizations to extend campaign reach to their members via email messages, newsletter articles, website content and advertisements. These partners now routinely list EnergyCodeAce.com as a prime resource and help distribute messaging for ECA, adding to the program's reach and credibility. ECA is featured on the Energy Commission's newly launched Title 24 ORC (http://www.energy.ca.gov/title24/orc/) and the Energy Commission's Title 24 hotline staff routinely refers callers to ECA resources, tools and training. Shortly after the ECA site launch, we worked with the Energy Commission to send each of the nearly 600 building department offices across California jump drives and collateral materials to help them help their customers. This was repeated again in 2016 in preparation for the new Title 24, Part 6 standards becoming effective January 1, 2017. Our targeted outreach activities also included promotional sponsorships, presentations (both in person and virtual) and tabling events at chapter meetings, conferences and trade shows. ECA had a presence at over 70 industry events and webinars in 2015 – 2016. The key organizations listed above produced the majority of these and promoted ECA and our participation to their members and attendees via websites, emails, and electronic and print publications.</p> <p>We also routinely collaborate with these partners to inform our tools, resources and trainings – as well as theirs. For example, our new Designer Essentials Course, with nonresidential architects as the target audience, was developed in conjunction with the Energy Commission and with input from AIACC. In addition, AIACC and its local chapters sent members to the pilot of this course at PG&E's Pacific Energy Center where feedback was provided on the course structure, content and activities. ECA partnered with CABEC</p> |

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| | | | | | | <p>to establish the CEA exams, and currently we are working with the organization and surveying its members to better understand how the code could be simplified for ease of use. We coordinate with the Energy Commission to review all ECA tools and resources before publication, and to revise forms (e.g., the above-mentioned NRCC-PRF-01), and compliance manuals to make them more user-friendly.</p> <p>We also concur that it is important to help building department staff reduce the amount of time they spend explaining codes and standards to their customers. The ECA Fact Sheets and Trigger Sheets are designed to be used as building department counter staff as “customer handouts” that quickly and clearly communicate the need-to-know requirements for specific project measures (lighting, HVAC, fenestration, plan permit process, etc.). These resources are introduced in training designed for building department personnel, and are made available to building departments through download from the ECA website.</p> <p>In addition, the 2016 Application Guides, which we are developing in cooperation with the Energy Commission, focus on specific measure areas and present the essentials in terms that resonate with building industry professionals and include specific examples of what does and does not comply with Title 24, Part 6. Building department staff can refer customers to these Guides when they want a more in-depth understanding of options and considerations for a specific measure area.</p> <p>The Forms Ace is an interactive online tool that provides specific guidance on the compliance documentation required based on project-specific information. Many building departments have found it a great time-saver to be able to refer their customers to this tool to determine what they need to submit with a permit application.</p> <p>In support of certification and to broaden our reach, we worked with the ICC to achieve Preferred Education Provider status for Energy Code Ace training offerings.</p> <ul style="list-style-type: none"> • All of our courses (traditional classroom, v-class, and online self-studies) now qualify for ICC continuing education credits (CEUs), which are required for the many ICC certifications. • All of our courses also are recognized by CABEC for CEUs required for CEA credentials. We also have been instrumental in helping CABEC develop their robust certification program, including the CEA exam. <p>ECA traditional classroom courses for energy consultants and designers are recognized by the AIA for CEUs, and this year we are pursuing gaining AIA accreditation for our online training opportunities.</p> |

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| 2a | 67 | The ECA website has become widespread in use during the relatively short time it has been live. Based on our research, the evaluation team recommends the following three ways to improve user experience and optimize the website for all users: | <p>1. Improve functionality of the ECA website. Our findings indicate that the ECA website is a welcomed tool and popular destination for building department members and the building community. However, users find that the website can be cumbersome to use, especially to new users and those less familiar with building energy codes. Specific suggestions included added capabilities. The CI evaluation team recommends that the IOUs conduct further qualitative research to explore what design features would meet most users and potential user's needs.</p> | All IOUs | Accepted | <p>ECA believes strongly in continuous improvement and providing performance-based resources to the broad range of industry stakeholders that drive code compliance. We agree that all our offerings, including the site, must be informed by the ever-changing needs of this diverse community.</p> <p>In 2016 we conducted research, including interviews with ECA site users, to determine how we could better serve the industry. We are currently working on upgrading functionality and making the site even more inviting and easy to use. Site revisions are due to roll out by year end.</p> |
| 2b | 67 | | <p>2. Improve organization of the ECA website. Again, our findings indicate that the ECA website is a welcome, well-used resource by the building community. However, users found the website confusing to use and not intuitive. A number of specific suggestions indicated that the website should be organized by climate zone, compliance form, building area, or project type. Website users were also mostly unaware of available resources such as hotlines and help available through info@energycodeace.com. Building industry members were least likely to be regular visitors of the ECA website, which could be an indication that the current format of the information is not meeting their needs. We recommend that the IOU CI team further explores why and how users are coming to their website and how the site organization could be improved to best meet user needs.</p> | All IOUs | Accepted | Please note the response above also addresses this recommendation. |
| 2c | 67 | | <p>3. Partner and integrate. CI program implementers should take steps to form and strengthen partnerships with professional organizations frequented by the building community (such as CABEC, the American Institute of Architects, the international code council, and CALBO) and code enforcement agencies. They should</p> | All IOUs | Accepted | ECA strives to dramatically improve compliance with Title 24, Part 6 and Title 20 by working with industry stakeholders to understand their code compliance barriers and implementing solutions designed to address key market actors' specific job tasks and needs. We understand the critical importance of strategic partnerships with key stakeholders to achieving our goals. In order to be as effective as possible, we have approached our activities in a somewhat staged manner, beginning with a focus on market actors and related industry organizations considered initial primary targets due to their potential to garner significant energy savings, and with the plan to extend our |

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| | | | <p>continue to build and leverage current partnerships with local jurisdictions. Information supplied by ECA could be customized for jurisdictions and added directly to building department websites. Further, the IOUs should consider further research to investigate where building industry members seek information on the energy and or other codes and develop a presence there. These partnerships could expand the reach of ECA and provide consistency in messaging about energy code requirements statewide.</p> | | | <p>reach successively to those with lower savings potential. While all potential market actors have been included in our efforts, building department personnel and energy consultants were first targeted more pointedly, followed closely by design professionals and trades contractors for HVAC, retail and office lighting and envelope measures, and HERS raters. We will continue to grow our partnerships as we continue to expand our efforts throughout the market actor chain just as we have done in 2016 with the architectural community. Please see the reference to our new Designer Essentials course and AIACC collaboration noted below.</p> <p>Using this approach, we have successfully built and strengthened relationships with such organizations as the Energy Commission, CALBO, CBOAC, ICC, CABEC, AIACC, USGBC, AEE, CSI, IHACI, ASHRAE, CLTC, IALD and IES, and the local chapters of these associations across California. We have also broadened our reach to local governments through such endeavors as the Statewide Energy Efficiency Collaborative (SEEC) and the IOU Local Government Partnerships.</p> <p>ECA outreach activities include fostering relationships with these and other organizations to extend campaign reach to their members via email messages, newsletter articles, website content and advertisements. These partners now routinely list EnergyCodeAce.com as a prime resource and help distribute messaging for ECA, adding to the program's reach and credibility. ECA is featured on the Energy Commission's newly launched Title 24 ORC (http://www.energy.ca.gov/title24/orc/) and the Energy Commission's Title 24 hotline staff routinely refers callers to ECA resources, tools and training. Shortly after the ECA site launch, we worked with the Energy Commission to send each of the nearly 600 building department offices across California jump drives and collateral materials to help them help their customers. This was repeated again in 2016 in preparation for the new Title 24, Part 6 standards becoming effective January 1, 2017. Our targeted outreach activities also included promotional sponsorships, presentations (both in person and virtual) and tabling events at chapter meetings, conferences and trade shows. ECA had a presence at over 70 industry events and webinars in 2015 – 2016. The key organizations listed above produced the majority of these and promoted ECA and our participation to their members and attendees via websites, emails, and electronic and print publications.</p> <p>We also routinely collaborate with these partners to inform our tools, resources and trainings – as well as theirs. For example, our new Designer Essentials Course, with nonresidential architects as the target audience, was developed in conjunction with the Energy Commission and with input from AIACC. In addition, AIACC and its local chapters sent members to the pilot of this course at PG&E's Pacific Energy Center where feedback was provided on the course structure, content and activities. ECA partnered with CABEC to establish the CEA exams, and currently we are working with the organization and surveying its members to better understand how the code could be simplified for ease of use. We coordinate with the Energy Commission to review all ECA tools and resources before publication, and to revise forms (e.g., the above-mentioned NRCC-PRF-01), and compliance manuals to make them more user-friendly.</p> |

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| 2d | 67 | | 4. Track user satisfaction. The CI program participants responded enthusiastically to our request for feedback on CI program activities. This indicates that the tools are valuable and the community is engaged. We recommend that the ECA periodically ask users for feedback to track user satisfaction, determine user needs, and to inform future updates to all IOU CI program activities. | All IOUs | Accepted | ECA believes strongly in continuous improvement and providing performance-based resources to the broad range of industry stakeholders that drive code compliance. We agree that all our offerings, including the site, must be informed by the ever-changing needs of this diverse community. In 2016 we conducted research, including interviews with ECA site users, to determine how we could better serve the industry. We have also conducted surveys related to the Forms Ace tool. This year we are also expanding our training evaluation and feedback questionnaire to solicit users' recommendations for expanding and refining ECA offerings, in addition to the standard satisfaction data we currently collect. Additionally, we have a number of email addresses that are listed in multiple places on the site for feedback on the site as a whole, as well as individual tools and resources (see our Contact Us page for a full list). To date we have received and responded to over 550 messages through these email channels. We have also recently added "User Snap" feedback functionality to each page of the site to collect and respond to user input. |
| 3a | 68 | Our research shows that the ECA tools are a valuable resource for building departments, building industry, and energy professionals. Tool users indicate high satisfaction with the tools and they draw people to the ECA website. We recommend that the IOU CI team continues to develop ECA tools. | We recommend further research into building community needs and that the IOUs align tools with areas of energy code noncompliance. Based on our research and the feedback given by participants, some tools that the IOUs could consider are tools by climate type, building type, and project type. | All IOUs | Accepted | <p>We agree that continuing to investigate ideas and assess the need for new tools and resources should be an on-going part of our activities.</p> <p>While our Forms Ace tool tailors results to climate zone, building type, and project type, and our Fact and Trigger Sheets are specific to building type and project type, and call out climate-zone-specific information, we are considering new ideas for ECA resources by climate zone, building type and project type, including additional handouts for permit applicants for common project types.</p> <p>We also agree that providing building departments with resources for their clients applying for permits is a very effective way to enable building department members to effectively and consistently communicate code requirements to permit applicants, increase ECA brand awareness, and drive traffic to the ECA website and trainings. To this end we have developed our fact and trigger sheets, our new application guides, and our checklists. The 2016 Plans Examiner checklists create customized corrections lists as the Plans Examiner uses the checklist. The corrections lists have hyperlinks to code requirements in the ECA Reference Ace. This resource is meant to help plans examiners quickly, consistently and accurately communicate code requirements to permit applicants. The checklists and correction comments lists have been developed in collaboration with the Energy Commission, energy consultants and building department staff.</p> <p>The ECA Fact Sheets and Trigger Sheets are designed to be used as building department counter staff as "customer handouts" that quickly and clearly communicate the need-to-know requirements for specific project measures (lighting, HVAC, fenestration, plan permit process, etc.).</p> <p>In addition, the 2016 Application Guides, which we are developing in cooperation with the Energy Commission, focus on specific measure areas and present the essentials in terms that resonate with building industry professionals and include specific examples</p> |
| 3b | 68 | ECA tools are also seen as a way in which the building departments communicate with the building industry as they apply for permits. This is an opportunity for the IOUs to enable building department members to effectively and consistently communicate code requirements to permit applicants, increase ECA brand awareness, and drive traffic to the ECA website and trainings. | The IOUs should consider handouts that building departments can refer customers to on common project types. | | | |

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| | | | | | | <p>of what does and does not comply with Title 24, Part 6. Building department staff can refer customers to these Guides when they want a more in-depth understanding of options and considerations for a specific measure area.</p> <p>The Forms Ace is an interactive online tool that provides specific guidance on the compliance documentation required based on project-specific information. Many building departments have found it a great time-saver to be able to refer their customers to this tool to determine what they need to submit with a permit application.</p> <p>To better ensure that building department staff are aware of our offerings, in addition to our frequent email messaging to them, these tools and resources are introduced at our event booths, in presentations, webinars and training designed for building department personnel, and are made available to building departments through download from the ECA website. Additionally, shortly after the ECA site launch, we worked with the Energy Commission to send each of the nearly 600 building department offices across California jump drives and collateral materials to help them help their customers. This was repeated again in 2016 in preparation for the new Title 24, Part 6 standards becoming effective January 1, 2017.</p> |