

## Western HVAC Performance Alliance

### Compliance Committee

#### Recommendations on Title 24 Revisions



1. We all recognize that simplification of all processes will lead to greater compliance with the new standards. The primary goal should be to make the process as simple as possible while still meeting the energy goals of the State of California. **The CEC should continue to actively work with all parties who will be implementing the standards down to the end user level to find ways to simplify compliance. For example, developing a simplified method for some common compliance scenarios.**
2. Most of the failure to take out permits comes from alterations rather than new construction. For simple HVAC replacements, which are a large fraction of these projects, the current required paperwork is overkill. Our committee has worked with the CEC to develop two simplified and combined forms (CF1R-ALT-HVAC and MECH-1C). **We recommend that simplified forms be developed to replace ALL of the required forms, for the special case of simple HVAC replacements, and that proposed forms be reviewed carefully by code officials and contractors (the WHPA would be happy to serve in this role).**
3. The world of the contractor is slowly entering the computer age. For those who are already there, there is a need for simpler ways to fill out forms, rather than requiring repetitive writing on printed out forms. **We recommend a “Turbo-Tax” type application be developed to facilitate collecting and reporting information that goes on the forms, at least for simple HVAC replacements. At a minimum, forms should be PDF forms rather than flat documents.**
4. If data can be collected electronically, it can be mined for valuable information about compliance related activities. **We recommend that key information collected on the forms be stored in a searchable database, and that the database be made available to the public for job-related purposes and for compliance research.**
5. Enough is not known about compliance rates. The statistics gathered by the CEC from compliance documents will not capture the presumably large number of projects for which no permit was ever taken out and there is no paper trail whatsoever. **We recommend that the CEC work with the CPUC to conduct a thorough study focused on failures to take out permits, and that that study be conducted over several years (with early interim deliverables) to capture a true sample over the full term of an adopted standard cycle. The study should also evaluate what factors affect compliance rates.**

For more information, contact Kristin Heinemeier at [kheinemeier@ucdavis.edu](mailto:kheinemeier@ucdavis.edu) or 530-754-7667.