

Oscar L. Calleja
7600 SW 149 Street
Palmetto Bay, FL 33158

August 1st, 2016

Use of On-Site Renewables as credit to the ERI Score.
ERI Alternate path of compliance to the Florida Energy Conservation Code.

The use of renewable energy produced on-site should be encouraged and I believe should be approved to be used within the ERI Alternate path.

The concern would then be in establishing a “backstop” below which the building’s envelope and equipment efficiencies could not be traded away by the renewable credit. In the event the renewable energy producing system would not be available or be removed from the building at a future date, the Building’s Energy Efficiency should not fall below the current standard set by the Energy Code.

The ERI path is already more strict on the Building Envelope criteria by requiring compliance with the IECC 2015 Prescriptive Standards, thus a natural “backstop” is already in place. This is not the case for the Heating, Cooling and Water Heating efficiency levels. If on-site renewables are allowed to be “traded” for those, the overall building energy usage could be negatively affected whenever the renewable energy stops.

Therefore to insure a reasonable overall Building Energy usage “backstop”, a simulation must be done without the Renewable source and ensure that the buildings achieve a minimum level of energy efficiency that is similar to the other existing FBCECC paths.

My proposal is in line with the currently proposed Energy Mod # 6933 where On-Site Renewable Energy is allowed to be included in the ERI simulation to achieve a Maximum score of 58 **provided** that the building is modeled **without** the Renewables and it also achieves a Maximum score of 61. The number 61 is subject to change after technical debate and simulations that prove that it corresponds to similar passing scores using the 405 Performance methodology.