

Idaho 2012 Energy Plan Comments from the Idaho Raters and Auditors Association

The Idaho Raters and Auditors Association Board and affiliates have been dedicated toward the advancement of new construction building methods and practices as well as energy conservation in existing residential and commercial buildings throughout the state. We are leaders in green building practices as well as solid supporters of state and utility programs geared toward conservation.

In general we support the 2012 Idaho Energy Plan with a few comments.

The report indicates that residential usage represents 25% of the state total usage and is the second largest user group. In addition, comments were made referring to this as having the greatest potential for energy conservation and benefit to Idaho residents prosperity. With that being said, we find there are very few comments or details on the direction and efforts to be placed in residential conservation. There are a large number of construction jobs which can be permanently located in the state due to the labor intensive nature of residential energy retrofits and the limitless supply of projects available. In addition we are still currently building homes which underperform due to an emphasis on short term costs which burdens, the consumer, the taxpayer and the state of Idaho in the long run.

Implementation of the 2009 IECC codes. These codes are being adopted successfully in some areas and not in others. A cohesive plan to coordinate state efforts to implement the code throughout the state as soon as possible should be a high priority. Homes which do not comply will be an opportunity lost. It is far less expensive and far more productive to build properly new than it is to repair or replace later.

Third party verification can provide a network of educational resources as well as strategic partners to the code officials to improve the transition and reduce the costs to the consumer. These third party verifiers have been endorsed by the State of Idaho and have been practicing the policies embodied in the 2009 IECC for many years. They are highly educated, fully trained, and very knowledgeable about the transition difficulties which are typical of this process.

Existing homes should be required to have a "Hers Rating" or other type energy rating at the time they are purchased. This process should not be watered down or the results will be watered down as well. This will provide the new homeowner with a better picture of the true cost of one home versus another. A new homeowner will be more likely to implement an energy conservation measure when the home is empty, with a traditional mortgage option, at a reduced contractor cost due to the home being empty. All of this will speed the conservation effort and provide the greatest value to the consumer. As time passes after a homeowner has been in a home, the payback to that homeowner decreases and negatively impacts conservation measure potential.

Idaho Rater and Auditors have been working with state, utility and private organizations to successfully design, educate and implement new practices for over ten years. We would be available to participate or direct task force efforts in these areas.

State and public utility efforts should support local private energy related jobs and should not displace private conservation efforts.

Increased discussion of residential natural gas conservation should be included. The discussion should include barriers to natural gas energy conservation our electric only utilities have compared to other states where utilities include both gas and electric.

Commercial –

Adopt targets for fossil fuel reduction standards for all new buildings and major renovations based upon the Architecture 2030 Challenge, including the review and adoption of new building standards for progressive enhancement of building efficiencies on a regular basis as new building standards revisions are released.

Renewables-

Current incentives for renewable in the State of Idaho must be continued and should be enhanced, as they are below that of neighboring states and this can be a barrier to both conservation as well as additional green jobs, and the associated tax base within the state. Qualified green jobs will increase in surrounding states that will potentially result in a corresponding reduction of highly skilled construction workers moving out of the state as a result.

Thank you in advance for your consideration of our comments.

Best Regards,

Idaho Raters and Auditors Association Board Members

Eric Elliott

Tad Duby

John Coldiron

Tim Oleary

Brian Bennett