



December 19, 2008

Pennsylvania PUC
Attn: Secretary
P.O. Box 3265
Harrisburg, PA 17105

Dear Secretary:

The Green Building Alliance (GBA) thanks you for the opportunity to publicly comment on Act 129. With the passing of Special Session House Bill 1 and House Bill 2200, followed by Act 129, we are enthusiastic that the state of Pennsylvania will continue to move forward in securing solutions to our green building, energy efficiency, and renewable energy needs. In addition, our comments are outlined below for your consideration as taken from the latest version of HB 2200, printer number 4526. We hope that the following will assist in the development of guidelines to further implement SSHB 1 and Act 129.

GBA recognizes the impact of buildings on the environment in both carbon output and energy usage. Since buildings act as systems with many components interacting to form their energy profiles, it is important that efforts to reduce energy consumption recognize this. For example, simply replacing the heating and cooling plant of a building will show energy reduction, but if the building envelope has problems with infiltration or excessive solar gain that can be cost-effectively resolved, then incentives related to these types of solutions must be offered.

- Within Section 2 B.1.E (page 53, line 6), the following should be added: "The plan should not limit and should provide incentives for individual businesses to achieve energy efficiency measures where energy analysis completed by licensed engineers using approved energy models and nationally recognized building energy efficiency and conservation measures show such measures to provide effective energy reduction."
- Within Section 2 M.2 (page 61 line 13), the following should be added after "Energy efficiencymeasures approved by the commission": "In the case of energy improvements made to a building, insulation and air sealing should be prioritized."
- Within Section 2, Definitions, Quality Assurance (page 61 line 27), it states "...using nationally recognized tools and certification programs." We believe the following



amendment to that verbiage should be made: "In the case of energy improvements made to a building, analytical programs and measures that recognize the effect of improvements in the building envelope to reduce power consumption should be used."

Should you have any further comments or questions on the above, please feel free to contact us at any time. Again, we thank you for your participation in the hopes that high performance buildings remain an important aspect of the Commonwealth as we move towards the future.

Respectfully,

Ernie Sota
Chair, Public Policy Committee
Green Building Alliance
333 East Carson Street
Suite 331
Pittsburgh, PA 15219