



October 1, 2007

Att: Ms. Edie Chang and Mr. Robert DuVall  
Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812  
[ccplan@arb.ca.gov](mailto:ccplan@arb.ca.gov), [rduvall@arb.ca.gov](mailto:rduvall@arb.ca.gov)

Re: Public Input Ideas to Reduce Greenhouse Gas Emissions

Dear Ms. Chang and Mr. DuVall:

The California Association of Building Energy Consultants (CABEC) is providing a completed version of the "Attachment 1: Description of Emission Reduction Measure Form" in order to outline what we believe would be an important step in reducing greenhouse gases with much better compliance and enforcement of the state's Title 24 Building Energy Efficiency Standards. Please call me to discuss background information or any aspect of this recommendation.

I have omitted specific quantitative data for the following fields in the ARB form: *2020 Baseline Emissions Assumed, Percent Reduction in 2020, Cost-Effectiveness in 2020, Emission Reduction Calculations and Assumptions and Cost-Effectiveness Calculation and Assumptions*. The reason is that the data for these fields, while presumably not impossible to establish, would require a substantial effort that we're not able to undertake at this time. If the Air Resources Board is interested in pursuing our recommendation, we may be of some help (along with the California Energy Commission and one or more of the investor-owned utility companies) in obtaining relevant quantitative data to support this proposed emission reduction measure.

Yours truly,

Michael Gabel, CABEC Vice Chair & Energy Standards Committee Chair  
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