From: Walter Adams

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#### **Notes to Cost Effectiveness Recommendations**

### Section 1:

- Provide for inflation of the energy costs over time to improve the savings
- Include a section for Commercial construction the includes a 15 year mortgage.

# Section 2:

- Understand that adding other costs, carbon, health, average energy cost, will not
  make any measurers test better as the proposed measures for 2023 do not past the
  cost test.
- Consider the costs hidden the code, per example in the 2023 CBES code:
   Section 405.12 Energy Monitoring, that is very expensive to implement and will show very low savings.
  - Section 405.11.1 Automatic receptacle control that has the same issues.
  - Section 408 "TSPR" What is this and its cost to model is extremely expensive.
  - Section 402.4.6 Operatable opening interlocks to HVAC are another expensive thing to achieve for a low or no savings.
- My experience is that no change to a building to get closer to Net Zero will test positively on cost/benefit.
- And clearly if you want a code compliant building there is no such thing as "affordable". Just grades of expensive.

# Section 0:

Despite my work to design buildings that are better than code I have been told time and again that Efficiency Vermont wants no part of them because the net savings were not worth it to them. The idea that they would give away rebates for low net savings is out of the question, and where would the money come from?

### Section 1:

The idea that a commercial building owner would make his building better, because, including the cost of carbon and health benefits it was cost/benefit positive but from an operational standpoint was not does not pass the Vermonter test.

As a result we as a group should just add items and requirements to codes that we believe will get us closer to the Net Zero goal and "force", by requiring compliance, building that will be better for the world, despite the cost. The folks that pass measures and mandates without understanding the costs should be the ones to defend their action, not some committee trying to make impossible decisions. This should result in a significant reduction in economic activity and population in Vermont as the cost to live and work here gets ever higher in relationship to other places.