



**Additional Comments on Intro. 1629-A
Submitted November 17, 2017**

The American Council of Engineering Companies of New York (ACEC New York) appreciates the opportunity to share the following additional comments with you regarding Intro 1629-A, per recent discussions with staff.

- Due to the complexity and level of subject matter expertise required to successfully perform energy modeling of Covered Buildings, and in equal recognition of the difficulty associated with creating a prescriptive compliance pathway for energy performance at the level contemplated by the Bill, we strongly recommend that a simplified compliance tool based on energy modeling methodology be mandated as part of this Code amendment. This tool could take the form of an amplified version of the COMcheck software tool.
- Based on past experience with the Energy Code Committee during recent Code amendment processes, we strongly recommend that language be included in the Bill to require the Department to provide the appropriate and required third-party energy modeling and technical resources to allow the Committee process to be successful.

For further information please contact:

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