

## Finlayson, Ian (ENE)

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**From:** RAFFI MANJIKIAN <rmmpec@verizon.net>  
**Sent:** Wednesday, 10 August 2022 12:32 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Comments for the Record

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My comments for the record -

The delivery of these buildings should not be subjected to variability of operations with the reliance to meet stretch code conformance with only building modeling. Incorporating information technology tools to both visualize performance & operations is absent from the present draft (I apologize if I missed it in the present code).

Consider for commercial buildings greater than 50,000SF to conform to ASHRAE G26 high performance building operation guidelines. Impacting design, construction and actual performance holding to a benchmark with G36 enables monitoring and supports TEDI criteria for heating & cooling.

Data is the validation of the technology in buildings – conformance to design intent: thermal comfort, HSW ease of operations can be achieved and evidenced G36 and validated by building performance record - *who owns the responsibility of ensuring that the new building operates as designed?* Is there an entity that will be in that role to confirm the codes a implemented are maintained & persist?

The central component of all sustainability goals is the HVAC systems in buildings and there is no easy way to pinpoint problems as they arise having tools to monitor the performance 15minutes, hourly (final determination) is essential to know that goals not only meet intention but they remain in place for the life of the building and when necessary can adjusted as needs/code determines as such.

This was a substantial undertaking you have many familiar names on the panel to guide and digest the input from throughout the Commonwealth. I am grateful for the efforts and look forward to your feedback

I thank you in advance for your consideration

Kindly

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