

DOCKETED

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Comments for CEC-400-2025-011 Docket 24-BSTD-05

Additional submitted attachment is included below.



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September 12, 2025
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 24-BSTD-05
715 P Street
Sacramento, CA 95814-5512

Dear Commissioners and Staff,

The Inland Regional Energy Network (I-REN) is pleased to submit these comments as part of the public comment period for the California Energy Code Compliance Gap Analysis Staff Report. I-REN was formed as a partnership between Coachella Valley Association of Governments, San Bernardino Council of Governments, and Western Riverside Council of Governments, and provides equitable access to a vast range of energy-efficiency resources within San Bernardino and Riverside Counties.

The I-REN Codes and Standards program launched training, education, and technical assistance offerings in 2024. Making our buildings more energy efficient and capturing the subsequent savings takes understanding the codes, ensuring compliance, and knowing what resources are available. With that in mind, the program primarily supports local jurisdictions and building professionals with code comprehension and compliance.

I-REN offers the following comments for the Code Compliance Gap Analysis:

I-REN supports using this staff report as the staged foundation for a larger statewide compliance study.

A sequenced approach—first establishing common terms, methods, and data requirements; then field-testing; then scaling— which creates clarity for jurisdictions and improves the signal-to-noise ratio of the findings. The two-phase plan (near-term targeted field studies followed by longer-term tracking) should include explicit milestone check-ins to validate instruments, confirm sampling sufficiency, and make transparent mid-course corrections without undermining comparability across waves.

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our



I-REN supports adoption of a concise statewide lexicon and minimum indicator set for documentary, installed, and functional compliance.

Reporting these constructs separately avoids collapsing paperwork defects with field workmanship or system performance. A small, comparable indicator set—e.g., plan-check defect rate (documentary), HERS airflow/duct leakage pass rate (installed), and commissioning/controls verification (functional)—enables apples-to-apples benchmarking. Where a composite index is desired, it should be clearly derived from the three components and accompanied by documentation of weights and uncertainty.

I-REN supports prioritizing gaps with outsized field impact and historical variability.

Emphasizing envelope/air-sealing, ventilation & filtration verification, duct sealing/airflow, and nonresidential controls/commissioning—as well as additions/alterations and unpermitted work—targets the issues that most affect loads, peak demand, IAQ, and comfort, particularly in hot-dry Inland climates. The study should pair frequency with consequence weighting so a small number of high-impact functional failures are not masked by larger counts of low-impact documentation errors.

I-REN supports publishing actionable, low-burden tools alongside the study (checklists, annotated details, and multilingual field cards).

Translating analysis into plug-and-play materials reduces cognitive load at the counter and in the field, especially for small departments. Tools should be structured by compliance construct (documentary/installed/functional), highlight high-variance measures, and include “most common failure modes / quick fixes” to shorten re-inspection cycles. Plain-language, bilingual resources help ensure that the study’s benefits reach the full market.

I-REN supports an SOW that delivers transparent instruments, QA/QC protocols, privacy guardrails, and open, machine-readable outputs.

Standardized data dictionaries, evaluator calibration steps (with inter-rater reliability checks), versioned instruments, and clear anonymization procedures are prerequisites for credible comparison across jurisdictions and over time. Publishing codebooks and schemas (with units, valid ranges, and missing-data rules) enables reproducibility and independent review—key to the nuanced, public dialogue the Staff Report seeks to foster.

I-REN supports centering equity, feasibility, and measurable improvement as shared priorities guiding study design and implementation.

Results should be framed around “what a jurisdiction can implement this year” and “what reduces re-inspection rates next quarter,” with attention to language access, contractor availability, and housing stock differences. A privacy-protective, anonymized readiness/dashboard view (e.g., training uptake, re-inspection rates, plan-review times, digital permitting maturity) can illuminate progress without stigmatizing communities; interval displays and sample sizes should be shown to avoid false precision or league-table effects.

Sincerely,

Casey Dailey

Director of Energy & Environmental Programs, Inland Regional Energy Network