

DOCKETED

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September 4, 2025

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Mr. Drew Bohan, Executive Director
California Energy Commission
California Energy Commission
1516 9th Street, MS 37
Sacramento, CA 95814
LocalOrdinances@energy.ca.gov

**Re: California Energy Code Approval Request
City of Sunnyvale Ordinance No. 3244-25**

Dear Mr. Bohan,

Please be advised that the Sunnyvale City Council has adopted amendments to the 2022 Edition of the California Building Energy Efficiency Standards Code via Ordinance No. 3244-25, enclosed. The City of Sunnyvale adopted Ordinance No. 3244-25 to require end-of-life air conditioner replacement with a heat pump conditioner.

In accordance with Public Resources Code Section 25402.1(h)2 and Section 10-106 of the Building Energy Efficiency Standards, this package of materials includes the City of Sunnyvale's proposed local ordinance, which will result in buildings that consume less energy than they would under California's 2022 Building Energy Efficiency Standards Title 24, Part 6. Ordinance 3244-25 was adopted by the Sunnyvale City Council at public meetings on August 26th and will become effective September 25th, 2025.

Please find the following materials enclosed:

- Att. 1: This cover letter
- Att. 2: Staff report to the Sunnyvale City Council outlining the goals of the updated building standards. The staff report provides an explanation of the cost effectiveness results summary demonstrating the expected energy savings and the cost effectiveness of the ordinance in the City of Sunnyvale/Climate Zone 4.
- Att. 3: Ordinance No. 3244-25, which adopts updates to the City's Building Ordinance, including requirements for energy reach standards beyond Title 24, Part 6 baseline for single-family residential additions, and alterations. This provides clear requirements that buildings be designed to consume no more energy than permitted by Part 6.



- Att. 4: Evidence of CEQA compliance through the attached Notice of Exemption (Ordinance No. 3244-25).
- Att. 5: Cost-effectiveness Study

The City will continue to enforce Title 24, Part 6, as well as the proposed local amendments in Attachment 3. The City, with the support of the California Statewide Codes and Standards Reach Code Program, has performed cost-effectiveness analyses and attached them in Attachment 4 as required by the California Energy Commission for the local amendments to the California Energy Code. City of Sunnyvale determined at public meetings on August 12th, 2025, that the locally adopted amendment to the energy efficiency standards contained in Ordinance No. 3244-25 is cost-effective.

The proposed standards are more protective of the environment than the State standards, and there are no reasonably foreseeable adverse impacts, and so there is no possibility that the activity in question may have a significant effect on the environment. As the lead agency, the City has also determined that this activity is exempt from CEQA under section 15061(b)(3).

The ordinance (attached) will be effective on September 25, 2025.

We understand that, with AB130, the deadline for filing amendments by October 1, 2025, to make them effective is unclear. The City of Sunnyvale interprets AB130 to mean that the amendments we make to the 2022 code take effect 30 days after adoption by the City. We also understand that if clarification is made at a later date by the State that conflicts with our interpretation, we will address the conflict at that time.

Thank you for considering our ordinance for approval by the Commission. If you should have any questions, please feel free to contact me for further information.

Sincerely,

Suzanne Park, PE, CBO
Chief Building Official
spark@sunnyvale.ca.gov
408-730-7455

Cc: Tim Mensalvas tmensalvas@trccompanies.com



Sunnyvale

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