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Docket No. Docket 24-BSTD-05

Dear California Energy Commission,

Please find attached my formal public comment for Docket No. Docket 24-BSTD-05 titled "The Case for Requiring Certified Energy Analysts (CEAs) on All Title 24 Projects."

This submission includes my signed letter and supporting paper, "The True Value of a Certified Energy Analyst." I respectfully request that both documents be entered into the public record for consideration.

Thank you for your time and for the Commission's ongoing efforts to strengthen California's Energy Code compliance framework.

Kind regards,

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Additional submitted attachment is included below.



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19 October 2025
California Energy Commission
Docket Unit, MS-4 Re: Docket No. 24-BSTD-05
715 P Street Sacramento, CA 95814-5512
Public Comment Submission for Docket No. 24-BSTD-05

Subject: The Case for Requiring Certified Energy Analysts (CEAs) on All Title 24 Projects

Dear Commissioners and Staff,

I have worked in California's Title 24 compliance industry since 2005 and recently completed eleven months in the CABEC Certified Energy Analyst Mentoring Program. After nearly two decades in this field, I have reached one clear conclusion. The most effective way to close the energy compliance gap is to require a Certified Energy Analyst on every registered Title 24 project.

Attached is my research paper, *"The True Value of a Certified Energy Analyst,"* completed through CABEC's mentoring program. It explains that the compliance gap does not come only from an inaccurate energy calculation. The deeper issue is the disconnect between the energy calculation, the approved plan set, and what is actually built and verified in the field.

Every trade involved in construction must be licensed or certified. There is over 40 CSLB licenses required in California. The general contractor, architect, structural and mechanical engineers, HVAC installer, plumber, electrician, roofer, dry-waller, solar contractor, HERS rater, and building inspector are all certified professionals. Yet the person who prepares the Title 24 compliance documentation that governs every one of these roles is not required to hold any certification?

While many non-certified energy consultants are skilled and experienced, they are not required to maintain continuing education or stay current with frequent code updates. Certified CEAs, through CABEC membership and ongoing training requirements, are continuously educated on new Energy Code changes, compliance software updates, and implementation standards. Without this structure of professional development and accountability, even well-intentioned consultants can fall behind. This lack of oversight often a certified Energy Analyst provides the missing link. CEAs are trained to model accurately and to integrate the energy measures into the architectural, mechanical, and structural plans so that the design can actually be built and verified. They understand how to interpret the energy code, how to coordinate with the entire project team, and how to ensure the documentation aligns from start to finish.

When a certified CEA is mandated to supply the Title 24 calculations, that is when this industry will finally take the energy code seriously. The compliance gap will begin to close, and we will see a measurable improvement in the quality of construction, documentation, and verification. ECC Raters and Energy Consultants will no longer have to fight for compliance on every project, because the foundation will be set correctly from the start.

The AEA Plan Examiner's Mentoring Program is a step in the right direction. Plan examiners hold the key to improving compliance, and when they are fully informed, they can prevent many of the errors that cause confusion later. The program is already making tremendous progress, But there is 541 jurisdictions to get on board and as plan examiners begin to recognize the difference in the quality of work produced by certified CEAs, the entire industry should follow that lead. With that said, more education, stronger mentorship programs, and greater homeowner awareness is needed. As long as I am part of this industry, I will continue to advocate for equality and for a mandated Certified Energy Analyst on every project.

I have taken the CEA exam myself, and it is not easy. Earning this certification represents a real commitment to technical mastery and ethical practice, and it deserves to be recognized and required. I may not have much influence yet, but I am confident that if reform starts here, we can finally end the compliance gap and rebuild trust in the process. The commission will have an easier time measuring the effectiveness of compliance.

Requiring CEAs for all Title 24 submittals would achieve several key outcomes:

1. Increase accountability among all parties involved in design, construction, and verification.
2. Reduce plan check corrections, change orders, and inspection failures.
3. Improve industry professionalism and public confidence in compliance documentation.
4. Ensure that the Energy Code delivers real, measurable performance results in California buildings.

Instead of funding another study of the compliance gap, or finding ways to track non permitted HVAC installations, the Energy Commission should focus on the measurable benefits of CEA involvement. Requiring certification for energy consultants would be one of the most cost-effective actions the state can take to improve code compliance and protect public interest. Once the building plans have a clear direction, the build team will find it easy to comply with the given energy code requirements.

A Certified Energy Analyst on every project is the strongest insurance policy California can implement to ensure Title 24 is correctly applied, documented, and verified in the built environment. Let's break the cycle of valuing fast and cheap Title 24 Energy reports and start valuing what a certified CEA can provide on a project, which includes added credibility: Hiring a CEA offers clients and design teams greater confidence that the energy calculations are accurate, thorough, and optimized for their project

Thank you for your leadership and for the opportunity to contribute to this docket. Please include my attached paper in the record for consideration. I also appreciate anyone in this industry who takes the time to read my view points.

Respectfully submitted,



Angela Gregory

CEA Candidate

Angel Oak Energy

Attachment: *The True Value of a Certified Energy Analyst* (CABEC Single Family Mentoring Program Final Research Abstract, October 2025) By Angela Gregory with Angel Oak Energy

CABEC Mentorship Program link: <https://cabec.org/mentorship-program/>

<https://cabec.org/aea-cea/>

https://calbem.ibpsa.us/wp-content/uploads/2024/12/CalBEM-2024_Education-Panel-Compiled-Slides.pdf

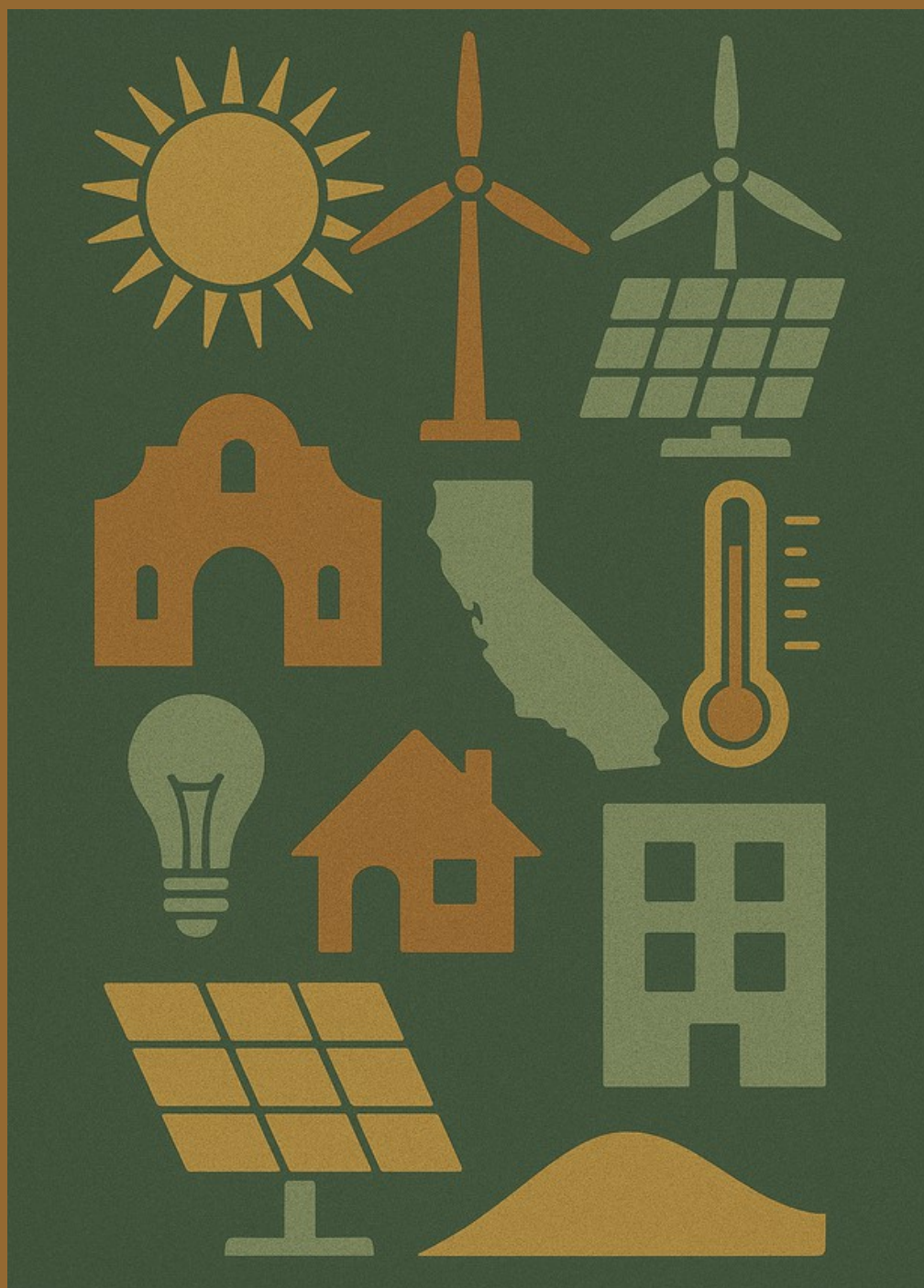
<https://www.3c-ren.org/where-to-find-ceas/>

For more information on the AEA program for AHJ's and Plan Examiner's email Sally Blair;
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https://drive.google.com/file/d/1t6hvJRipD2qQEhRURwcER_-vbShlEQtK/view?usp=sharing

The True Value of A Certified Energy Analyst With CABEC

EXPERTISE BEYOND THE TITLE 24 ENERGY CODE



CABEC SINGLE FAMILY MENTORING PROGRAM
FINAL RESEARCH ABSTRACT

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The True Value of A Certified Energy Analyst With CABEC

ABSTRACT

My assignment for the final month of the CABEC Mentoring Program was to research the value of being a Certified Energy Analyst (CEA). The initial, straightforward answer lies in technical proficiency. However, after 11 months of intensive study, combined with 19 years of frontline experience running my family's ECC/Hers rating company. I have uncovered a far deeper and more critical value. This paper argues that the true worth of a CEA in the coming era is not merely their ability to produce a more accurate energy model, but their unique position to diagnose and solve the systemic communication failures that have plagued our industry for decades. The CEA Assessment Research Project inadvertently proved that the greatest point of failure is not in calculation, but in the translation of that calculation to buildable plans. This disconnect was enabled by a system of misaligned incentives a "conflict of interest triangle" between the builder, designer, and rater—that the new 2025 Energy Code Compliance (ECC) program is designed to dismantle.¹ In this new era of accountability, the true value of a CEA is transformed: from a simple calculator to a strategic protector, an integrator, and the most vital insurance policy a project can have.

Introduction: A Question from the Trenches

For 19 years, I have lived and breathed Title 24 compliance from the ground up. Building things right in California is a multi-generational legacy for me, passed down from my grandfather, a commercial HVAC designer, to my father, a 42-year HVAC veteran and one of the first HERS raters. Since 2005, I have been on the front lines of our family's rating business, which meant I was the one on the phone explaining to a frustrated contractor why their equipment does not meet or match the CF-1R performance form. I was the one screening the "as built" equipment against a CF-1R and approved plan set and seeing a disconnect so wide you could drive a truck through it.

That experience has been my greatest teacher. It is what led me to the CABEC Mentoring Program and to my CEA exam. My final assignment was to define the value of this certification I was pursuing. The obvious answer, I thought, was accuracy. My research began there, but what I found was something far more profound. I found the answer to a question that has haunted my entire career: Why is it so hard to get things built right and tested right when the approved plans and CF-1R energy calculation showed the building complied and was approved by the AHJ? But yet no field team knew how to follow it and comply with it? This paper is the answer to those questions.

ANGELA GREGORY OCTOBER 3, 2025

The Surface Value: A Question of Accuracy

The most direct way to measure the value of a CEA is to ask: do they produce better work? The CEA Assessment Research Project sought to answer this by collecting data from approximately 75 new construction projects. The preliminary data indicated that, on average, CEAs are indeed more accurate than their non-certified counterparts.

This finding, while positive, only tells a small part of the story. It confirms that the training and rigorous examination process required by CABEC results in a higher level of technical proficiency. A CEA is more likely to correctly interpret the code, apply the right inputs, and produce a CF-1R that is, on paper, compliant. This has tangible benefits, as CEAs are often required for utility rebate programs and can provide flexibility in meeting local reach codes. But this focus on the accuracy of the CF-1R misses the forest for the trees.

The Deeper Problem: The Great Disconnect on the Plans

The most profound discovery of the Certified Energy Analyst (CEA) Assessment Research Report (Brian Selby, 2017) was accidental. The data revealed a much larger, more systemic problem:

There's typically not enough information on the plans to adequately plan check energy documentation and plans for compliance.

This is the Great Disconnect I have witnessed firsthand for 19 years. The CF-1R, whether produced by a CEA or not, is only the first step. Its value is nullified if its specifications are not translated into clear, buildable, and verifiable instructions on the architectural plans. Time and again, I have seen a meticulously detailed CF-1R, specifying a energy feature or ECC/Hers measure, for example, reduced to a vague note on the plans that says, "See per Title 24." Or at worst nothing at all. Often times the designs do not reflect any a buildable energy compliant assembly, that can be plan checked, built, verified or inspected successfully at all. It's almost like it's left off on purpose? This leaves the building inspector and the ECC rater no documentation to explain the code was not met. That causes friction and direct responsibility shifting to the ECC rater, AHJ, installer and most importantly the owner. Then the pressure is on to pass ECC and inspection at all costs even it means the rater's license is at stake. This ambiguity is where compliance goes to die. It creates a cascade of failures, evidenced by the endless plan check correction comments issued by building departments across the state. *(Oh I have read them!)*

The past cycle and current reality

The designer submits the plans under pressure to move fast. The plan examiner, without clear details, has little to check against. The builder, working from vague instructions and never was forced to actually learn to build to the CA energy code, either guesses or defaults to the cheapest option then makes the HVAC installer take care of the ECC measures/testing. The rater is left at the end of the project to deliver the bad news, explaining to the entire team why the as-built reality does not match a document nobody could properly interpret in the first place. The rater is no longer just a third-party verifier but also a building interpreter and a code police nobody wants to pay for. For the rater this often means that when a test fails, payment is withheld. They rater shop for an easier rater.

The Systemic Cause: The Conflict of Interest Triangle

For years, I wondered why this disconnect persisted. Why would a designer, whose reputation is on the line, submit plans that were so clearly incomplete? The answer, I've come to understand, lies not in a lack of skill, but in a system of misaligned incentives, a "conflict of interest triangle" between the builder, the designer, and the rater.

- **The Builder's Pressure:** The builder's business model is based on speed and budget. Delays, rework, and change orders are direct threats to their profitability.
- **The Designer's Pressure:** The designer or energy consultant's primary, repeat client is often the builder. Keeping that builder happy is essential for future work.
- **The Rater's Dilemma:** As the independent, third-party verifier, Our job was to flag non-compliant work. But doing so created friction, delays, and costs for the builder.

Under the old HERS system, the person who hired the rater, often the HVAC installer or the builder, maybe the designer, also had the power to fire them. This created an impossible dynamic. Rather than admitting a design misalignment or confronting a subcontractor, the path of least resistance was to pressure the rater to "make it work" or simply replace them with someone more "friendly." The system incentivized replacing the messenger instead of fixing the problem. Vague plans became a survival tactic to get through plan check and push the ultimate responsibility for compliance onto the rater in the field.

The True Value of a CEA: The Protector and the Integrator

This brings us to the true value of a Certified Energy Analyst in this new era. It is no longer just about accuracy. It is about risk management.

The true value of a CEA is the synthesis of deep modeling knowledge with a profound understanding of the entire project ecosystem, from design and engineering to construction and verification. My 19 years in the T24/ECC field showed me every possible point of failure. My 11 months in the CABEC program gave me the tools and the language to prevent those failures from ever happening, or at least protect my work while doing it. While striving for my projects to be energy efficient, healthy and comfortable.

In the new 2025 code cycle, the CEA's job is not just to produce a CF-1R. Their job is to produce **defensible design** that can be **executed from start to finish** on the field. Your cf-1r energy calculation is simply not just a complying project that can be registered and sent off with a plan set or as easy as clicking the QII or VCHP button. Slap it on the plan set pages with no context no communication no awareness. No, by doing that in the next code could halt the project and expose the truth and the risk can be expensive.

This means:

- **Integration:** Ensuring the energy model is not a standalone document, but is fully and clearly integrated into the architectural, structural, and mechanical plans.
- **Collaboration:** Proactively working with the entire design team to resolve conflicts before they become unbuildable plans.
- **Protection:** Providing the entire project team, the owner, the architect, and the builder—with a clear, buildable, and verifiable set of documents that serves as an insurance policy against the catastrophic financial risks of a project lockout.

The clients who will thrive in this new environment are not the ones looking for the cheapest, fastest CF-1R. They are the smart ones: the energy consultants who put in the time to not only learn the code but to create a CF-1R that makes sense for the project scope and the client's wants, and make the code-compliant energy features shine throughout the entire building plans; the designers who are now forced to value accurate and code-compliant CF-1Rs and seek out those who can accurately portray the energy code on the plan set they were never forced to learn; and the ECC raters who see the tidal wave of enforcement coming and are desperately looking for policies and procedures to protect their licenses and risk of non-compliant ECC testing projects.

The problem is, it's not going to happen overnight for the industry to catch on. It will happen one failed ECC verification at a time, followed by one project registry lock, by one failed inspection, followed by one angry owner and one lawsuit that exposes the whole team from design to field, But this is going to be a hard lesson. After they go through a nightmare they will actively search for certified CEA's and ECC/Hers raters that have a deep understanding of the code, and how to apply efficiently and effectively for the project scope, climate zone and client wants. I am hoping, but doubtful it's 20 years since HERS raters were written and required in the code. Sadly until it's a Title 24 mandate to have only certified CEA's register energy calculations,

we may need see it happening quickly.
ANGELA GREGORY

OCTOBER 3, 2025

Conclusion

A New Beginning

My journey through the CABEC program was not just about learning to be a better energy modeler or a Title 24 energy expert. It was about understanding the systemic forces that have made it so difficult to build things right. The value of being a CEA is not in the certification itself, but in the perspective it provides. It is the ability to see the entire field of play and to architect a process that leads to success.

The 2025 code and the new ECC program have finally aligned the rules of the game with the values my grandfather instilled in me: build it right the first time. For the professionals in our industry who share that value, the future is incredibly bright. Our expertise is no longer a liability; it is the most valuable asset on any project. The 19 years I spent in the trenches were not a waste; they were the education I needed to become the protector and integrator that this new era demands. I now can stop explaining the code to the ones who think it's not a benefit to them, and start explaining it to the very ones who value a project built right and to code.

Acknowledgments

I am signing off from the CABEC mentoring program, but not from the CABEC community, or from the Title 24 energy industry. In fact, I now have the tools to navigate this challenging field with confidence. Being a certified energy consultant is not about the ECC/hers measures its using good building science sense with the code in mind and that's what I plan on doing with my future clients. When will this industry wake up and stop valuing "fast and cheap"? Not sure? I will aim to be fast, but cheap is not what my service is about.

My heartfelt thanks to Gina, Michelle, Luke, Alea, Doug, Steve, Marina, the entire CABEC program, and the CABEC Conference Committee for giving me the courage to step forward, present, and share my knowledge with anyone willing to listen.

The code sections, answers, and guidance you provided gave me the missing pieces to my puzzle and restored my faith in this industry. You make the energy code less daunting and more attainable. You may not reach everyone, but you reached me, and that's one more person the industry needs to keep moving forward and making a difference on a Title 24 build.

Thank you for this incredible opportunity.

—Angela Gregory

See you all on the other side!

LINK TO ASSESSMENT RESEARCH REPORT

References:

A N G E L A G R E G O R Y O C T O B E R 3 , 2 0 2 5