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Administrative Updates RFI Comments

This letter provides comments from Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) Request for Information regarding the Administrative Updates to Title 20 Appliance Regulations.

Additional submitted attachment is included below.



January 19, 2026

California Energy Commission
Docket Unit
Docket No. 25-AAER-01
715 P Street, MS-4
Sacramento, CA 95814

Topic: Administrative Updates to Title 20 Appliance Regulations

Dear Carlos Baez:

This letter provides comments from Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) Request for Information regarding the Administrative Updates to Title 20 Appliance Regulations.

The CA IOUs are among the largest utility companies in the nation, serving over 32 million customers in the state. We are committed to helping customers reduce energy costs and consumption while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We respectfully submit the following comment to the CEC:

1. The CA IOUs support the CEC's initiative to update Title 20 to align with changes adopted in federal regulations.

The CEC proposes revising the Title 20 Appliance Efficiency Regulations to align with federal standards where preempted by federal law. The revisions also clarify intentional differences between federal and state requirements in areas not subject to preemption.

The U.S. Department of Energy (DOE) has adopted changes affecting many products and equipment. To ensure these federal standards remain in effect as state standards—and to collect relevant and timely data for products with updated or new test procedures—we encourage the CEC to update Title 20 by the end of 2026. Incorporating these federal standards into Title 20 will permit California to continue accessing data through the Modernized Appliance Efficiency Database System and preserve associated energy savings should a federal standard be repealed or become inoperable, inapplicable, or otherwise invalid under federal law.¹

¹ "§ 1605. Energy Performance, Energy Design, Water Performance, and Water Design Standards: In General," *California Code of Regulations*, title 20 § 1605(a)(2), (2023).

The CA IOUs recommend that the CEC align Title 20 with the federal standards shown in Table 1 and the federal test procedures listed in Table 2.

2. The CEC should amend 20 CCR § 1606 to include reporting requirements for federally regulated products with newly issued standards and test procedures.

Since the last administrative update to the Title 20 appliance regulations, multiple federal appliance energy conservation standards and test procedures have been created or revised. DOE established corresponding changes to product reporting to maintain consistency with current and upcoming federal requirements. The CA IOUs recommend that the CEC amend 20 CCR § 1606 to include reporting requirements for federally regulated products that reflect updated performance metrics and product characteristics so that the CEC can accurately classify products for the application of any existing and future standards.

Products affected by these federal updates include, but are not limited to:

- Refrigerated buffet and preparation tables for commercial refrigeration equipment²
- Blast chillers and freezers for commercial refrigeration equipment³
- Consumer boilers⁴
- Circulator pumps⁵
- Conventional cooking products⁶

² Energy Conservation Program: Test Procedure for Commercial Refrigerators, Refrigerator-Freezers, and Freezers; Final rule, 88 Fed Reg 66152 (Sept. 26, 2023), Docket No. [EERE-2017-BT-TP-0008-0042](#), Document No. 0042, available at Regulations.gov.

³ Ibid.

⁴ Energy Conservation Program: Test Procedure for Consumer Boilers; Final rule, 88 Fed Reg 15510 (Mar 13, 2023), Docket No. [EERE-2019-BT-TP-0037-0027](#), Document No. 0027, available at Regulations.gov.

⁵ Energy Conservation Program: Test Procedure for Circulator Pumps; Final rule, 87 Fed Reg 57264 (Sep 19, 2022), Docket No. [EERE-2016-BT-TP-0033-0012](#), Document No. 0012, available at Regulations.gov &

Energy Conservation Program: Energy Conservation Standards for Circulator Pumps; Final rule, 89 Fed Reg 44464 (May 20, 2024), Docket No. [EERE-2016-BT-STD-0004-0142](#), Document No. 0142, available at Regulations.gov.

⁶ Energy Conservation Program: Test Procedure for Cooking Products; Final rule; technical correction, 87 Fed Reg 51492 (Aug 22, 2022), Docket No. [EERE-2021-BT-TP-0023-0024](#), Document No. 0024, available at Regulations.gov &

Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products; Direct final rule, 89 Fed Reg 11434 (Feb 14, 2024), Docket No. [EERE-2014-BT-STD-0005-12825](#), Document No. 12825, available at Regulations.gov.

Table 1: Updates Due to Changes to U.S. DOE Standards

T20 Section	Appliance	Relevant Code of Federal Regulation
1605.1(g)	Dedicated-Purpose Pool Pump Motors	10 CFR 431.485(c) Table 1
1605.1	Air Cleaners	10 CFR 430.32(ee)(2)
1605.1(a) Table A-3	Miscellaneous Refrigeration Products	10 CFR 430.32(aa)(1)(ii) and 10 CFR 430.32(aa)(2)(ii)
1605.1(a) Table A-2	Refrigerators	10 CFR 430.32(a)(2) Table 2 and 3 and 10 CFR 430.32(a)(3) Table 4 and 5
1605.1(b)(1) Table B-2	Room Air Conditioners	10 CFR 430.32(b)(2) Table 2
1605.1(c)(1) Table C-5	Air Conditioning Equipment	10 CFR 431.97(b) Table 1
1605.1(c)(1) Table C-5	Air Conditioning Equipment	10 CFR 431.97(b) Table 2
1605.1(c)(1) Table C-8	Computer Room Air Conditioners	10 CFR 431.97(f)(2) Table 13 and 10 CFR 431.97(f)(2) Table 14
1605.1(c)(1) Table C-9	Variable Refrigerant Flow Multi-Split Air Conditioners and Heat Pumps	10 CFR 431.97(g)(2) Table 16
1605.1(e)(2) Table E-6	Non-weatherized Gas Furnaces and Mobile Home Gas Furnaces	10 CFR 430.32(e)(1)(iii)
1605.1(f)	Consumer Water Heaters	10 CFR 430.32(d)(2)
1605.1(f)(3)(A) Table F-4	Commercial Water Heaters	10 CFR 431.110(a)
1605.1(f)(3)(B) Table F-5	Residential-duty Commercial Water Heaters	10 CFR 431.110(c)
1605.1(g)	Circulator Pumps	10 CFR 431.465(i)
1605.1(g)(1) Table G-1	Gas-fired Pool Heaters	10 CFR 430.32(k)(2)
1605.1(k)	Medium Base Compact Fluorescent Lamps	10 CFR 430.32(dd)(2)
1605.1(k)(2)	General Service Lamps	10 CFR 430.32(dd)(1)(i)-(ii)
1605.1(q) Table Q	Clothes Dryers	10 CFR 430.32(h)(4)
1605.1(r)(1)	Cooking Products	10 CFR 430.32(j)(1) and (2)
1605.1(s)	Electric Motors	10 CFR 431.25(n) Table 8 10 CFR 431.25(o) Table 9 10 CFR 431.25(p) Table 10
1605.1(t)	Distribution Transformers	10 CFR 431.196(a)(3) Table 3 10 CFR 431.196(b)(3) Table 6 10 CFR 431.196(b)(4) Table 7 10 CFR 431.196(c)(3) Table 10

Table 2: Updates Due to Changes to U.S. DOE Appliance Test Procedures

T20 Section	Appliance	Relevant Code of Federal Regulation
1604	Air Cleaners	10 CFR 430.23(hh) (Appendix FF to subpart B of part 430)
1604(a)(2) Table A-1	Refrigerated Buffet Tables and Preparation Tables	10 CFR 431.63 and 10 CFR 431.64
1604(a)(2) Table A-1	Blast Chillers and Blast Freezers	10 CFR 431.63 and 10 CFR 431.64
1604(d) Table D-3	Portable Air Conditioners	10 CFR 430.23(dd) (Appendix CC1 to subpart B of part 430)
1604(e) Table E-1	Boilers	10 CFR 430.23(n) (Appendix EE to subpart B of part 430)
1604(g)(3)(D)	Circulator Pumps	10 CFR 431.464(c)
1604(g)(4)	Dedicated-Purpose Pool Pump Motors	10 CFR 431.484(b)
1604(d)(1) Table D-3	Portable Air Conditioners	10 CFR 430.23(dd) Appendix CC of subpart B to part 430
1604(q)	Clothes Dryers	10 CFR 430.23(d) Appendix D2 of subpart B to part 430
1604(o)	Dishwashers	10 CFR 430.23(c) Appendix C2 of subpart B to part 430
1604(p)(1)	Clothes Washers	10 CFR 430.23(j) Appendix J of subpart B to part 430

The CA IOUs appreciate the opportunity to provide these comments and encourage the CEC to incorporate the recommended administrative updates to maintain alignment with federal requirements. We look forward to continued collaboration with CEC staff as this rulemaking progresses.

Sincerely,

A large, bold, handwritten signature in black ink, appearing to read 'RWB'.

Rob Bohn
Manager, Codes & Standards
Pacific Gas and Electric Company

A handwritten signature in black ink, appearing to read 'Scott Higa'.

Scott Higa
Acting Sr. Manager, Codes and Standards
Southern California Edison

A handwritten signature in black ink, appearing to read 'Kate Zeng'.

Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company