

**DOCKETED**

<b>Docket Number:</b>	23-DECARB-03
<b>Project Title:</b>	2025 California Building Energy Action Plan
<b>TN #:</b>	268724
<b>Document Title:</b>	BEEP Coalition Comments - BEEP Coalition Comments on the CEC Draft Building Energy Action Plan
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	BEEP Coalition
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/20/2026 9:34:12 AM
<b>Docketed Date:</b>	2/20/2026

*Comment Received From: BEEP Coalition  
Submitted On: 2/20/2026  
Docket Number: 23-DECARB-03*

**BEEP Coalition Comments on the CEC Draft Building Energy  
Action Plan**

*Additional submitted attachment is included below.*



## **BUILDING ENERGY EQUITY & POWER**

February 20, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Dear Commissioners and Staff:

The [Building Energy, Equity & Power \(BEEP\) Coalition](#) respectfully submits these comments in response to the California Energy Commission's draft "[California Building Energy Action Plan](#)" released in December 2025.

We appreciate the process that staff underwent to create this draft. Many of our coalition members were consulted in the development process for this action plan, and we see the impact those consultations had on this draft. Staff does an excellent job of balancing the urgency and benefits of decarbonizing existing buildings with the real risks and barriers our communities experience. We thank the CEC staff for being so thoughtful in incorporating our comments and ideas.

We also appreciate the CEC's analysis and inclusion of tenant protections, but we must highlight the importance of acknowledging that the Tenant Protection Act of 2019 is set to sunset in 2030. This would jeopardize millions of Californians who rely on these protections when being evicted for substantial renovations. The CEC's 2025 Energy Action Plan is intended to provide a comprehensive clean energy strategy for California's buildings, therefore it must include policy recommendations and willingness to urge the California state legislature to extend this critical legislation as California strives to reduce GHG emissions from buildings, these two are inherently integrated with each other and such recommendations must be included.

Additionally, we respectfully request revisions to the Action Plan's reference to HCD's Policy Recommendations: Recommended Maximum Safe Indoor Air Temperature report regarding the general maximum safe indoor air temperature of 82 degrees for residential dwelling units. As authors of AB 209 (2022) sec. 31 and stakeholders of HCD's development of the report, we urged HCD to include language from their initial draft report that included an analysis of varied temperature impacts to high

risk populations. While the proposed general maximum safe indoor air temperature of 82 degrees “is meant to apply to a broad range of the population, some people have a higher risk of health impacts from heat. Conditions that are associated with higher heat susceptibility include, but are not limited to, cardiovascular disease, respiratory disease, kidney disease, and poor thermoregulation. For such high risk populations, we recommend a safe upper limit of 79 degrees.” And as we know vulnerable populations are most at risk to extreme heat events. Including a maximum safe indoor air temperature of 82 degrees in this report may set a dangerous precedent that will impede any future advocacy for a temperature that is inclusive of California’s most vulnerable populations.

Moreover, we appreciate the data included in the plan to highlight the number of manufactured homes in the state. However, Table 7 fails to list the number of manufactured homes in Fresno County. We work with residents in mobile home parks in the city of Fresno and request that the plan is updated to include this information or the description for Table 7 be more specific. Mobile homes are undercounted and thus it is important to accurately report this number.

Also, under “equity metrics,” we appreciate the note of barriers. The CEC has been developing a set of equity metrics related to building performance strategy related to SB 48 implementation that might also help inform this section. We encourage the CEC to coordinate across divisions to adopt effective and consistent equity metrics.

The BEEP Coalition would like to respectfully submit an [Interagency Coordination Proposal](#) for CEC Commission and staff consideration. Under this proposal, BEEP will work with advocate partners to convene government and academic stakeholders to develop a comprehensive strategy for equitable building decarbonization. The CEC holds many valuable parts of this process - as thoughtful outlined in this draft action plan - but we agree with staff that the CEC cannot do this alone. It is our goal that this collaborative process would codify and expand the important work being done across agencies already.

If you have any questions about our position, please reach out to us at [info@beepcoalition.org](mailto:info@beepcoalition.org). Thank you for your time and consideration of our comments!

Sincerely:

The BEEP Coalition