

DOCKETED	
Docket Number:	23-DECARB-03
Project Title:	2025 California Building Energy Action Plan
TN #:	268753
Document Title:	CodeCycle.org Comments - CodeCycle Comments on 2025 Building Energy Action Plan
Description:	N/A
Filer:	System
Organization:	CodeCycle.org
Submitter Role:	Public
Submission Date:	2/20/2026 4:41:26 PM
Docketed Date:	2/20/2026

Comment Received From: CodeCycle.org
Submitted On: 2/20/2026
Docket Number: 23-DECARB-03

CodeCycle Comments on 2025 Building Energy Action Plan

Additional submitted attachment is included below.

February 20, 2026

Dear Commissioner McAllister, Commissioner Skinner, and Chair Hochschild,

CodeCycle.org is a nonprofit organization working to improve Title 24 compliance and enforcement processes. We support the CEC's vision of using energy efficiency to decarbonize the California building sector, and we are pleased to see the wide array of strategies set forth in the draft "*California Building Energy Action Plan*."

CodeCycle.org especially appreciates the recommendation in the *Action Plan* to "*continue to improve the usability of the Energy Code compliance systems*." It is CodeCycle's perspective that improving the compliance and enforcement process in a wholistic manner, that addresses all types of construction, will achieve the greatest results for California.

Too often over the last decade, the entities responsible for Title 24 in California have explicitly argued against the need for more robust, more accurate, and easier to use systems to assist with energy code enforcement. The CEC has argued that, at least for new construction, Title 24 compliance is quite high. We have repeatedly asked the CEC to be more transparent as to the technical basis for that conclusion. Nonetheless, there are still no published citations by the CEC tied to the CEC's perspective on high compliance rates. The lack of documentation has adversely impacted policy recommendations with respect to compliance improvement.

The *Action Plan* continues this pattern:

"While compliance with the Energy Code in new construction is understood to be high . . ."

Or:

"Code compliance in new construction and commercial projects is generally considered high, but there are opportunities for compliance improvement in existing buildings."

Request: We ask that the CEC provide citations for those assertions in any subsequent or final drafts. If the CEC cannot provide citations for the assertions, we request that the statements be removed. Further, if the statements cannot be substantiated, CodeCycle.org requests that the analysis of "*opportunities for compliance improvement in existing buildings*" be expanded to assess how compliance improvement efforts can be applied to all building types. The construction industry and building departments engage with Title 24 as a continuum: retrofit to alternation to new construction. Smart enforcement strategies should reflect that reality.

Sincerely,



Dan Suyeyasu
Executive Director, CodeCycle.org
dan.suyeyasu@codecycle.org