

DOCKETED

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[CEA] for the 2025 California Building Energy Action Plan

Additional submitted attachment is included below.

To: California Energy Commission
From: **California Energy Alliance**

Date: March 11th 2025

Subject: **California Energy Alliance for the 2025 DRAFT COMMISSION REPORT:
*California Building Energy Action Plan***

Dear Commissioners and Staff,

This letter includes edits and technical recommendations to the CEC's current draft report on the *California Building Energy Action Plan*. The California Energy Alliance's (CEA) responses are based on a collective intelligence of people who have long-standing deep expertise and applied professional practice of Title 24 and the construction and maintenance of California's built environment. The following edits represent the collective voice of California's diverse energy stakeholders. Our intent is to provide the Commission with a practical perspective that will actualize a cohesive comprehensive clean energy strategy for the State of California.

1) On "New Policy Approaches Are Needed to Tackle Existing Buildings" and "Building Decarbonization Presents Opportunities to Expand California's Clean Energy Workforce"

- a. California Energy Alliance acknowledges the Commission's task of achieving a comprehensive clean energy strategy. In order for the Commission to achieve this goal, the California Energy Alliance recommends that High Road jobs, workforce, and contractor definitions be co-created alongside California's diverse energy stakeholders.
- b. The California Energy Alliance encourages the Commission to ground its understanding of a Clean Energy Workforce based on the definition of High Road according to state law within CA Unemployment Insurance Code Section 14005 (r). The California Energy Alliance, composed of diverse energy stakeholders, is interested in assisting the Commission in setting these definitions. The Commission's comprehensive clean energy strategy should open opportunities for economic mobility; therefore, Clean Energy Jobs should signify economic mobility.

- c. The California Energy Alliance is reminding the Commission that there are distinctions between High Road jobs, workforce, and contractor definitions. Acknowledging these distinctions will make the Commission’s clean energy strategy become more actionable and equitable. While the Commission has included 'High Road' in its glossary, the California Energy Alliance emphasizes that a single glossary entry for 'High Road' could be insufficient.
- d. For example, a High Road job could be defined as: a job that offers family-supporting wages, employer-provided benefits, worker voice, opportunities for continued advancement, training, and education. In support of Construction Trades Workforce Initiative (CTWI) and JCEEP’s comments, the California Energy Alliance recommends the Commission to consider quality jobs as part of its comprehensive clean energy strategy.
- e. The California Energy Alliance is reminding the Commission that the State of California has the participation of contractors who value the continued investment of training a knowledgeable and skilled workforce in many areas of the state. In the Commission’s current draft, it says that there is a “lack of knowledgeable, trained contractors” and “properly trained network of contractors.” The California Energy Alliance is reminding the Commission that there exists a network of trained and skilled contractors who are concerned with poor code compliance. **These knowledgeable and trained contractors have been raising the need for a centralized database to chronicle and streamline building permit compliance data which include Title 24 Mechanical forms. We encourage the Commission to seek these contractor’s voices for they are part of California’s diverse energy stakeholders.**

2) On “Increased Standards Compliance Is an Important Pathway to Building Decarbonization”

- a. On Page 8 of the report the Commission writes, “While compliance with the Energy Code in new construction is understood to be high, compliance in existing construction is lower and less understood.” The California Energy Alliance asserts that systemic compliance issues persist statewide, in both new construction and existing buildings. CEA’s Acceptance Testing community, who see new construction projects every day can attest to this. To effectively reduce

GHG emissions, the California Energy Alliance encourages the Commission to urgently prioritize code enforcement and compliance across the state.

- b. California Energy Alliance recognizes that addressing systemic compliance is a big challenge. Our group invites the Commission to leverage the long-standing expertise of those with direct and applied experience of Title 24 and the life cycle of California's built environment.
- c. **CEA supports the concerns raised by CodeCycle.org¹ regarding transparency on code compliance and performance gaps in the field.** When presenting information on compliance, the Commission is encouraged to provide citations across the full range of compliance assessments and estimations. The CEC and its partners should act with urgency to deploy, test, and iterate modern compliance tools to address systemic compliance issues. While there may be some differences between enforcement processes based on construction types, an *Integrated Compliance Enforcement Ecosystem* will be most effective if it works synergistically across building types and permit types. The California Energy Alliance asserts that it's time to rethink—from first principles—how the energy ecosystem communicates and conducts Title 24 implementation.
- d. The California Energy Alliance recommends the Commission to be better organized and align their publications to produce consistent messaging. For example: while the current Draft Commission Report states that “*Energy Code compliance in new construction is understood to be high*”, the Commission’s [California Energy Code Compliance Gap Analysis](#) published on July 29th of 2025 finds no empirical basis for this assumption and in fact emphasizes the lack of measurable, statewide compliance data. This inconsistency between two published reports from the Commission, even if one of them is on a draft status, signals that the Commission does not currently have robust analysis on Energy Code compliance rates. The California Energy Alliance is interested in helping the Commission avoid inconsistencies and find solutions to mitigate noncompliance.
- e. Our group of diverse energy stakeholders is available and encouraged to help the Commission improve compliance including the ways in which it shares information to ensure consistency, transparency, and alignment on reliable and

¹ DOCKET LOG 24-BSTD-05, TN 268753, [CodeCycle Comments on 2025 Building Energy Action Plan](#)

accurate data rather than relying on modeling assumptions, limited samples, or information that does not reflect field-level enforcement.

3) On “Strengthened Building Standards Continue to Decarbonize New Buildings”

- a. The current draft report writes, “The CEC analyzes proposals for mandatory and voluntary measures in an open process supported by work from California utilities as part of the ratepayer-funded Codes and Standards Program overseen by the CPUC and informed by input from many knowledgeable stakeholders... the Energy Code has been focused on energy efficiency and conservation measures that also maximize GHG emission reductions from new construction.”
- b. **If energy efficiency standards are being considered for further adoption of building electrification goals, then it is imperative for the Commission to be sensitive to feedback from California’s diverse energy stakeholders which include active market actors and energy professionals. The California Energy Alliance encourages the Commission to take on a posture of collaborative improvement to bring better alignment between codes and standards and the market transformation they’re intended to achieve.** In addition to the aforementioned issues around enforcement of existing measures, there does not appear to be any current process or effort to generally reevaluate all existing measures for their market adoption and consider their prudence in the future energy code cycles. Many measures are in need of fine tuning for effective market adoption, whereas others should arguably be removed as not cost-effective in future code cycles.
- c. While a recurring theme of this letter is to raise the Commission's oversight towards compliance, here we are focussing on the Commission’s reluctance to consider the reevaluation of existing measures that failed to achieve market transformation due to poorly considered code language or are otherwise failing their core cost-effectiveness test. This lack of attention from the Commission is perhaps an anachronism, but nevertheless, our experience with diverse stakeholders is that they have earned cynicism from past engagement when the Commission received their input but ignored it. Regardless of whether or not this is due to a lack of stakeholder engagement and feedback, a deficiency in the Commission to understand that feedback, or giving ample time to provide

feedback, the incentive structures frame a consistent pattern of failed outreach to stakeholders, prioritizing theoretical deemed savings over realized benefits for Californians.

- d. The perceived lack of cost-effectiveness of the energy code has resulted in market actors turning to legislative remedies to direct the Commission by statute instead of engaging in the regulatory process. The California Energy Alliance anticipates this type of activity to continue if the Commission does not change the ways in which it engages with California's diverse energy stakeholders.

4) On "Maintaining focus on Equity"

- a. In support of the DACAG's recommendations, the CEA urges the Commission to implement decisive and actionable protections for California's vulnerable and low-income households. These strategies should be informed by and are a response to the voices of the communities they serve.
- b. While the report rightly addresses the needs of tenants and low-income households, the California Energy Alliance recommends that the Commission incorporate the perspectives of essential workforces who are part of the built environment. Specifically, when developing a comprehensive clean energy strategy, the California Energy Alliance encourages the inclusion of unrepresented groups who have on-the-ground insights on the maintenance and life cycle of buildings.

5) The California Energy Alliance is reminding the Commission that there exists a High Road job in its own Acceptance Testing program, but its under-utilization undermines the Commission's goal of decarbonizing the building sector.

- a. Installation quality is the missing link between California's energy codes, actual energy savings, and reduced GHG impacts. The California Energy Alliance highlights the role of the Acceptance Test Technician (ATT)² as a catalyst for ensuring that a clean energy workforce is part of enforcing quality compliance statewide. As California's frontline energy efficiency workers, ATTs are critical to

² DOCKET LOG 24-BSTD-05, TN 267713, [California Energy Alliance Comments - \[CEA\] Compliance Improvement - Title 24, Part 6 Language on the Role of ATT](#)

the state's clean energy strategy; however, systemic non-compliance since the 2016 code cycle has severely undermined their role. This underutilization has prevented California from realizing its intended clean energy goals in the building sector which makes up one quarter of California's GHG emissions.

- b. Most recently, National Environmental Balancing Bureau's (NEBB) withdrawal from the ATTCP program in 2025, and CalCERTS ceased operations as a HERS Provider in 2024. These closures underscore the structural inconsistency affecting Title 24's compliance ecosystem. These events represent a significant loss of field energy efficiency expertise and highlight the urgent need for an improved, enforceable, and transparent statewide compliance framework in California.
- c. **To improve code compliance, the California Energy Alliance recommends the Commission to leverage data sourced by the Acceptance Testing community as they have accumulated substantial evidence on permitting patterns, documentation quality, and field-level compliance issues which are not reflected in statewide datasets. Incorporating this practitioner-generated information into early compliance-metric development will provide the Commission immediate and actionable insight into where procedural gaps occur.**
- d. The California Energy Alliance encourages the Commission to continuously work with the state's diverse energy stakeholders in utilizing the Role of the Acceptance Testing Technician in improving energy efficiency and code compliance.

The California Energy Alliance looks forward to continuing its engagement on the future of the [California Building Energy Action Plan](#) with Commission staff and Commissioners.

The mission of the California Energy Alliance is to bring beneficial, equitable change to energy standards, policies, and programs by developing consensus among diverse and engaged stakeholders. We are working towards energy productivity to achieve economic growth, environmental justice, security, and affordability for Californians.

Thank you for your engagement with our collective voice,

California Energy Alliance



caenergyalliance.org