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## **Proposed Rrestructuring 2025 ENERGY CODE CALIFORNIA CODE of Regulations TITLE 24, PART 6**

The proposed restructuring of the 2025 California Energy Code of regulation Title 24, Part 6 goes along way to make the regulations more clear.

I would recommend to make further changes to this proposal as follows:

1. Keep Subchapter 1 as proposed.
2. Keep Subchapter 2 as proposed.
3. Change the title of Subchapter 3 to Civil, and include all envelop and structural regulations.
4. Change the title of Subchapter 4 to Mechanical, and include all relevant mechanical and elevator system regulations.
5. Change the title of Subchapter 5 to Plumbing, and include all relevant plumbing regulations.
6. Change the title of Subchapter 6 to Electrical, and include all lighting, power distribution, solar PV and storage, and elevator electrical system (i.e., lighting) regulations within that new subchapter.

By putting all relevant energy regulations as related to each trade in this fashion would make the applications of the regulations a lot more clear for each trade engineer or contractor, and makes their enforcement simpler for plan examiners and inspectors.

Currently, you have to look a lot of different places in the energy code to find what are the electrical, mechanical or structural or civil related regulations and is very easy for the designers as well as the plan examiners or inspectors who enforce the regulations to miss them.

Furthermore, I would recommend to include a direct link to all Reference Appendices that relate to each trade within those sections, and if possible to provide a short snip of applicable portions of those Appendices as a footnote.

In addition, the current proposed section 603.2.4 includes sections 603.2.4.1.1 through 603.2.4.1.3 and 603.2.4.1.4 and 603.2.4.1.5 all relate to non electrical requirement that needs to be verified by a mechanical trade, which should be relocated to the mechanical section. And as for Subchapter 7 for renewables and storage the content can be divided between civil, mechanical and electrical. All related solar (thermal) heating should be part of mechanical, structural construction requirements under Civil and the regulations for the solar PV and storage system can be included under the electrical, as they are entirely electrical in nature.

In closing, I would like to state that I have been in the construction industry as an enforcer for over 44 years, and have seen how the energy code has evolved from few

pages to what it stands today. I believe the regulations will expand further in the future, and the proposed changes will make the process of compliance easier for everyone.

Thank you for your time.

Behzad Eghtesady, P.E.