

DOCKETED	
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Comment Received From: CA Statewide Utility Codes and Standards Enhancement Team

Submitted On: 4/2/2026

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Draft CASE Reports Posted for Public Comment

Additional submitted attachment is included below.

DRAFT CASE REPORTS POSTED FOR PUBLIC REVIEW

April, 2, 2026

California Energy Commission

Docket No. 25-BSTD-03

Commissioner McAllister and Building Standards Office staff,

The Statewide Utility Codes and Standards Enhancement (CASE) Team appreciates the California Energy Commission (CEC) providing an opportunity for all interested parties to engage in the pre-rulemaking process for updating the 2028 Energy Code (Title 24, Part 6).

The Statewide CASE initiative presents recommendations to support the California Energy Commission's efforts to update California's Energy Code to include new requirements or to simplify or upgrade existing requirements for various technologies. Three California Investor-Owned Utilities (IOUs) — Pacific Gas & Electric Company, San Diego Gas & Electric, and Southern California Edison sponsored this effort. The program goal is to prepare and submit proposals that would result in cost-effective enhancements to improve energy efficiency and energy performance and reduce greenhouse gas emissions in California buildings.

As of April 1, the Statewide CASE Team has posted 16 draft CASE Reports focused on nonresidential occupancies on [Title24Stakeholders.com](https://title24stakeholders.com) (<https://title24stakeholders.com/2028-cycle-case-reports/>) for review and comment by the California Energy Commission and all parties engaged in the energy code update process. Investment in measures focusing on residential occupancies was paused for the 2028 Energy Code update after the passage of AB130 last year.

The Statewide CASE Team encourages comments on the proposed code changes and the analyses presented in the draft reports. Where feasible, commenters are also asked to provide data and justifications to support their remarks.

For those reviewing the reports, we are requesting comments to be sent to info@title24stakeholders.com and the individual who is identified in the introduction

section of each CASE Report. The Statewide CASE Team plans to evaluate and address comments before submitting final versions to CEC over the next few months.

Comments are respectfully requested by the dates accompanying the titles listed below. Participants in the CASE Team's process were notified via email when reports were posted on [Title24Stakeholders.com](https://www.title24stakeholders.com). CASE reports are available for public comment for four weeks.

- [Compressed Air Drying](#) – Posted 3/9/2026, Comments due 4/13/2026
- [Controlled Environment Horticulture](#) – Posted 2/27/2026, Comments due 4/3/2026
- [Data Centers Efficiency Improvements](#) – Posted 3/17/2026, Comments due 4/14/2026
- [Enhanced Air-to-Water Heat Pump Performance](#) – Posted 3/4/2026, Comments due 4/3/2026
- [Healthcare Exceptions](#) – Posted 3/17/2026, Comments due 4/14/2026
- [HVAC Fault Detection and Diagnostics](#) – Posted 3/6/2026, Comments due 4/14/2026
 - *This report is supported by the California Energy Alliance (CEA)*
- [Indoor Lighting Controls](#) – Posted 3/19/2026, Comments due 4/16/2026
 - *This report is supported by the California Energy Alliance (CEA)*
- [Indoor Lighting Power Density](#) – Posted 3/19/2026, Comments due 4/16/2026
- [Nonresidential Fenestration](#) – Posted 3/5/2026, Comments due 4/3/2026
- [Nonresidential Heat Pump Water Heater Ventilation Clean Up](#) – Posted 3/25/2026, Comments due 4/22/2026
- [Nonresidential HVAC Air Distribution](#) – Posted 3/25/2026, Comments due 4/22/2026
- [Nonresidential Water Heating](#) - Posted 3/9/2026, Comments due 4/14/2026
- [Process Boilers](#) – Posted 2/6/2026, Comments due 3/6/2026
- [Process Steam](#) – Posted 3/12/2026, Comments due 4/13/2026
- [Solar Pool Heating](#) – Posted 3/11/2026, Comments due 4/13/2026
- [Traction Elevators](#) – Posted 3/25/2026, Comments due 4/22/2026

The CASE Reports follow the [template](#) that the CEC provided to all members of the public that want to submit code change proposals for consideration.