

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-BSTD-05
<b>Project Title:</b>	2025 Energy Code Compliance Initiatives
<b>TN #:</b>	269407
<b>Document Title:</b>	Cal-Green Measures You Say
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Avery Ray Colter
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/3/2026 2:44:09 PM
<b>Docketed Date:</b>	4/3/2026

*Comment Received From: Avery Ray Colter  
Submitted On: 4/3/2026  
Docket Number: 24-BSTD-05*

## **Cal-Green Measures You Say**

In reference to SOL Solutions's reference to AHJs' enforcement of the CalGreen measures, for the energy analyst, especially in concert with mechanical engineers, this involves a can of worms called the ACCA Manuals. CBECC has no capacity to report HVAC system loads based on the model, and EnergyPro's load module does not calculate using Manual J methods, which especially for buildings with residential dwellings creates the necessity to enter data into RHVAC or other such software for Manual J/D/S analysis, then either export this rather clumsily to EnergyPro or transcribe it by hand to CBECC! Or just code models in each software independently. I'm sure the IES people will say they have a way of doing everything everywhere all at once, but am I the only one who experiences mental blocks with their graphical entry methods? I've been doing this for 25 years, I'm not the oldest coder, but I certainly haven't been the newest for a minute either!