

**DOCKETED**

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## **Request for Change - CA Energy Code as it relates to ADU power supply**

As you review California's future energy demands, please coordinate with local utility suppliers and consider how regulations and codes affect Accessory Dwelling Unit housing goals:

The CA Energy Code, as currently written and enforced by local jurisdictions, is creating unnecessary and costly barriers to the construction of much needed (and state-mandated) ADU housing units. CA Accessory Dwelling Unit laws were designed to streamline and 'fast-track' ADU projects, producing more housing and more efficient residential density.

However, some unreasonable utility service requirements, costs and application red-tape are pumping the brakes on ADU momentum throughout the state, and this is one of the biggest roadblocks currently facing ADU designers and builders in CA.

PG&E inefficiencies and outrageous service planning timelines should be evaluated separately.  
Here, I would specifically like to address the 2025 CA Energy Code requirements for electric meter service to ADUs.

PG&E policy has been a moving target since the start of the CA ADU laws, but currently they are enforcing dedicated, separate electric meter panels (NO SUBPANELS) in order to supply power to any Attached and Detached ADUs (JADUs are currently exempted by PG&E from requiring a separate meter panel).

These ADU electric meters are sized based on electric load calculations for the project, as specified by the CEC. 125amp electric meters are more than sufficient to supply the electrical needs of a typical 750sf ADU (including code-required 'electric ready' requirements).

However, 2025 California Energy Code states...  
in Section 110.10(e)1...'The main electrical service panel shall have a minimum busbar rating of 200 amps.'

As I understand it, this code section applies specifically to solar ready requirements. 200amp or 225amp meter panels are a great fit for a larger residence. In areas such as our central coast 'Climate Zone 5', where Title 24 calcs do not require solar systems for typical ADUs, why weigh down these ADU projects and PG&E infrastructure with an oversized 200amp panel requirement?

In residential neighborhoods where multiple ADUs are proposed, excess amperage

requirements stack up and have a 'snowball' effect on dated PG&E infrastructure, potentially triggering costly and time-consuming upgrades to transformers, wires, poles, etc.

As if to support the case for a 125amp allowance for ADUs, 2025 California Energy Code, in Section 150.0(s) says that Energy Storage Systems are not required when electric service is 125amps or less.

We all know CA has power distribution and storage issues, and that legislators and code writers are pushing hard for full 'electrification'.

However, the weight of fixing California's solar, battery storage and energy distribution issues/goals is better carried by larger industrial, commercial and planned residential developments, not individual ADU projects.

Please UPDATE the CA Energy CODE to specifically allow 125amp meter panels at ADUs.

Sincerely,  
Matt