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Restructured 2025 Energy Code

I am submitting this comment as a Title 24 Compliance Consultant with experience applying the California Energy Code across a wide range of building types, including high-rise multifamily, mixed-use, and affordable housing projects. I appreciate the Commission's ongoing efforts to improve accessibility and alignment with national model codes; however, I have significant concerns regarding the proposed restructuring of Title 24, Part 6 and its practical impact on the compliance community.

Disruption to Established Workflows

The current structure of Title 24, Part 6 has been in use for many years, and practitioners across California – including consultants, engineers, architects, and plan checkers – have developed efficient, code-cycle-tested workflows around it. A wholesale restructuring of the code's organization, even with the goal of alignment with IECC and ASHRAE 90.1, introduces substantial friction into these processes. Training staff, updating internal tools and templates, and relearning navigation patterns represents a real cost to firms, particularly smaller practices that do not have the resources to absorb a prolonged transition period.

Loss of Institutional Familiarity with Existing Section Numbers

Title 24 practitioners navigate the code by section number fluently. References to sections such as 150.0, 140.4, or 110.9 are deeply embedded in compliance documentation, software platforms like CBECC, acceptance testing forms, and interdisciplinary communications. When these reference points are reorganized, that accumulated institutional knowledge is effectively reset. This is not a minor inconvenience – it affects the reliability and efficiency of compliance work across the entire industry simultaneously.

Reduced Utility for Project-Specific Code Navigation

One of the practical strengths of the current Title 24 structure is that practitioners working on a specific building type can quickly orient themselves to the sections relevant to their project. The proposed restructuring, while potentially appealing to designers seeking discipline-specific sections, makes it more difficult to identify and cross-reference all requirements that apply to a particular building type in one place. Compliance work inherently requires a holistic view of applicable requirements – mechanical, envelope, lighting, and renewables – and a structure that fragments these by discipline rather than by building type works against that need.

Recommendation

I do not oppose the Commission's goal of greater harmonization with national model codes in the long term. However, I urge the Commission to carefully weigh the transition burden on the existing practitioner community before adopting a restructuring of this scale. If the restructuring moves forward, I strongly recommend a phased implementation with an extended parallel-use period, robust cross-reference documentation mapping old sections to new, and coordinated updates to compliance software and acceptance testing forms prior to the effective date.