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Peak Cooling Concerns

Peak Cooling is a major issue in compliance in CZ 4, 8-15. We have had multiple projects with extremely high efficiency compliance margins failing due to peak cooling. Example, in CZ10, R38 sealed attics, 0.27/0.21 windows, R21 walls with R5 cont and ERV all passed efficiency by 5+ LSCe but peak cooling still failed. The only ways peak cooling has passed is significant overhangs OR Whole House Fans. Most production homes do not have significant overhangs so adding a WHF is a must. The push to Whole House Fans seems entirely regressive as they offer no real value in Code Defined Peak Cooling metrics. Per published documentation, Peak Cooling is defined as 4PM-9PM, July-November. Reduction in power usage during this time is required to be meant but the method being proposed is completely unrealistic. Homeowners are expected to not use their HVAC systems during the hottest parts of the day in the hottest time of the year in some of the hottest climates in CA. A WHF does help with cooling via natural ventilation but only when the outdoor temperature (and outdoor air quality) is ideal. Turning your system off on a 70 degree day and running the WHF is agreeable but doing the same in middle of summer when the outdoor temperature in CZ10 is over 95, CZ12/13 at 90+ and CZ14/15 at 100+. Homeowners simply won't do this in Peak usage times or during times of poor outdoor air quality. WHFs do not have filters or provide any benefit to the overall home's envelope.

Why weren't renewables considered in this? PV is required on all new residential construction. All Homes also must be battery ready. A solar backup battery panel can be designed such that it provides additional power in times of peak energy usage by powering HVAC equipment to offset grid strain.

Whole House Fans are an extremely poor solution to a problem that can be offset by already required renewable sources. Homeowners will not supplement their cooling at peak times and systems will continue to run.