

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-BSTD-03
<b>Project Title:</b>	2025 Energy Code Compliance Software, Manuals and Forms
<b>TN #:</b>	270535
<b>Document Title:</b>	Bronte Payne Comments - Response to Peak Cooling Memo Update
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Bronte Payne
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/10/2026 5:35:33 PM
<b>Docketed Date:</b>	6/11/2026

*Comment Received From: Bronte Payne*  
*Submitted On: 6/10/2026*  
*Docket Number: 24-BSTD-03*

## **Response to Peak Cooling Memo Update**

*Additional submitted attachment is included below.*

June 10, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Docket 24-BSTD-03 – Peak Cooling Update Memo**

I appreciate the opportunity to provide comment on the Peak Cooling Update Memo and the revised limit based on climate zone. We support the California Energy Commission’s (CEC) proposal to revise the limit to a 30% increase in peak cooling energy for climate zones 4, 8, 9, 11, 12, 13, and 15, and up to a 25% increase in climate zones 10 and 14.

The updated modeling completed by CEC staff demonstrates that updating the limits would provide flexibility for homebuilders to comply with the peak cooling metrics, while continuing to require designs that limit increases in peak cooling.

We support the CEC implementing the proposed changes to the peak cooling requirement. However, we strongly encourage the CEC to further update the peak cooling metric in the compliance software to focus on peak grid demand, rather than strictly examining only mechanical cooling loads.

**Peak Cooling Metric Designed to Reduce Summer Peak Demand**

The CEC’s April 25, 2025, Peak Cooling Memo provided rationale for the implementation of the peak cooling metric. The memo stated that “projects meeting the budgets for these two Energy Code metrics can still experience unintended peak period cooling energy between 4pm and 9pm that is higher than the standard design. This can result in exacerbating peak loads on California’s electric grid during summer heat waves and higher utility bills for consumers.”<sup>1</sup> The memo further stated that “while the 2025 LSC hourly factors will encourage buildings to minimize demand during the

---

<sup>1</sup> Peak Cooling Memo, April 25, 2025, pg. 1

winter peak and overnight, the CEC also finds it prudent to manage near- and medium-term summer peak generation challenges.” Updating the peak cooling metric to be based on total net energy usage during peak hours, rather than simply the cooling energy needs, will better align compliance requirements with the stated goals of the peak cooling requirement.

### **Battery Storage Reduces Peak Demand on the Grid**

Battery storage is one of the best tools to reduce peak demand on the grid. Battery storage paired with solar helps to reduce peak demand on the grid by allowing stored home solar generation to serve on-site loads later in the day. Virtual Power Plant (VPP) programs further help reduce peak demand by providing a flexible, dispatchable resource to serve peak demand during some of the most expensive hours on the grid. The current peak cooling metric in the CBECC software does not account for home battery storage when analyzing peak cooling despite the fact that battery storage helps address the near- and medium-term summer peak generation challenges highlighted by CEC staff. In not accounting for battery storage, the peak cooling metric could require homebuilders to make additional costly design changes to their homes, despite the reduction in total net energy usage provided by the battery.

Time of use rates in California and the JA12 requirements in the Energy Code will also help ensure that home batteries are cycling during the peak cooling hours prioritized by the CEC. The vast majority of new homeowners in California are required to take service on a time of use rate which generally have a standardized on-peak time of 4-9pm. The high on-peak rates during these hours incentivize customers to use energy from their batteries during this time, which reduces net energy usage on the grid. By using energy from the home battery, customers can lower the amount of costly energy imported from the grid during these hours helping to address energy bill concerns highlighted by CEC staff.

JA12 compliant battery storage installed on single family homes is required to reset to the compliance cycling capacity after 72 hours if the cycling capacity has dropped below the compliance threshold. The combination of time of use rates and the JA12 requirements help ensure that batteries will be cycling, helping to reduce peak demand on the grid. Additionally, the Strategy Specific Requirements in JA12 require that batteries be commissioned under one of the control strategies allowed in the reference appendices. These control strategies further ensure that batteries regularly discharge.

For example, the Time of Use Control requires that a battery begin discharging during the highest priced TOU hours of the day with this operation schedule being set in place before or during commissioning of the battery. The Advanced Demand Flexibility Control allows batteries to participate in virtual power plant or other demand flexibility programs in combination with the TOU control or basic control strategy.

Updating the peak cooling metric to properly account for the benefits provided by battery storage does not require an update of the code. Only the CBECC software would need to be updated to properly account for the impacts of battery storage on peak cooling. We appreciate the proposed updates to the peak cooling metric and encourage the CEC to further update the peak cooling metric to examine total net energy usage during peak hours, allowing battery storage to be properly credited for reducing peak demand on the grid.

We look forward to continuing to work with the CEC to update the peak cooling metric in alignment with state goals.

Sincerely,

Bronte Payne  
Senior Policy Manager, Sunrun