

DOCKETED

Docket Number:	25-EPIC-01
Project Title:	Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5)
TN #:	270862
Document Title:	Aaron Lubrano Comments - Support for Zero-Carbon Modular Housing in EPIC 5
Description:	N/A
Filer:	System
Organization:	Aaron Lubrano
Submitter Role:	Public
Submission Date:	6/18/2026 5:01:29 PM
Docketed Date:	6/19/2026

Comment Received From: Aaron Lubrano
Submitted On: 6/18/2026
Docket Number: 25-EPIC-01

Support for Zero-Carbon Modular Housing in EPIC 5

Sugarpine Engineering supports EPIC 5 investment in zero-carbon modular housing, particularly where it advances better MEP coordination, commissioning, and energy performance.

In our work, many building-performance issues are not caused by a lack of technology, but by inconsistent field coordination, unclear system integration, and systems that are difficult to commission or maintain after installation. Factory-built housing can help address these issues by moving more of the MEP integration into a controlled environment, where solar, storage, heat pumps, ventilation, controls, EV charging, and electrical infrastructure can be coordinated earlier and tested more consistently.

Modular construction creates an opportunity to improve quality control, reduce field conflicts, simplify commissioning, and deliver more predictable long-term performance. We encourage the CEC to prioritize EPIC 5 investments that support factory-built housing as a platform for reliable, well-coordinated, high-performance building systems.