

DOCKETED

Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	270895
Document Title:	California Association of Building Energy Consultants (CABEC) Comments - Recognition of CABEC Certified Energy Analysts (CEAs) as Qualified Design Reviewers under Section 1208
Description:	N/A
Filer:	System
Organization:	California Association of Building Energy Consultants (CABEC)
Submitter Role:	Public
Submission Date:	6/22/2026 9:40:39 AM
Docketed Date:	6/22/2026

Comment Received From: California Association of Building Energy Consultants (CABEC)

Submitted On: 6/22/2026

Docket Number: 25-BSTD-03

Recognition of CABEC Certified Energy Analysts (CEAs) as Qualified Design Reviewers under Section 1208

Additional submitted attachment is included below.

California Energy Commission
Efficiency Division
715 P Street
Sacramento, CA 95814

Subject: Docket #: 25-BSTD-03, Recognition of CABEC Certified Energy Analysts (CEAs) as Qualified Design Reviewers under Section 120.8

Dear Commissioners and Staff,

I respectfully request that the California Energy Commission recognize CABEC Nonresidential Certified Energy Analysts (CEAs) as qualified individuals to serve as Design Reviewers for the Design Review Kickoff and Construction Document Design Review Checklist Commissioning forms required by Section 120.8 of the Building Energy Efficiency Standards.

Section 120.8 describes Design Review as an additional review of construction documents intended to improve compliance with existing Title 24 regulations, encourage adoption of best practices, and promote designs that are constructible and maintainable. The purpose of this review is to provide an experienced professional with a fresh perspective to identify missing or unclear information and suggest design enhancements. These objectives align closely with the education, experience, and professional responsibilities of Certified Energy Analysts.

A CABEC Certified Energy Analyst is a professional who has demonstrated competency in California's Title 24, Part 6 Building Energy Efficiency Standards and proficiency in energy compliance modeling. CEAs are responsible for analyzing residential and nonresidential projects, preparing compliance documentation, and coordinating with architects, engineers, contractors, and building departments throughout the design and construction process. Through these activities, CEAs routinely review construction documents to identify omissions, inconsistencies, and design features that may affect code compliance, constructability, and building performance.

The CEA certification process establishes a level of knowledge and experience directly relevant to the objectives of Design Review. Certification requires:

- Successful completion of rigorous multiple-choice and compliance modeling examinations;
- Verification of relevant education and project experience;
- Completion of professional training focused on California's Energy Code;
- Demonstration of proficiency in compliance documentation and performance analysis;
- Adherence to ethical business practices and standards of professional conduct; and

- Ongoing continuing education and recertification to maintain current knowledge of evolving code requirements and industry practices.

The Nonresidential CEA certification encompasses both nonresidential and multifamily buildings and emphasizes applied knowledge of Title 24 requirements, compliance methods, and coordination with design and construction teams. Because CEAs work directly with construction documents and energy compliance calculations, they are uniquely positioned to identify issues affecting energy performance and regulatory compliance before construction begins.

Importantly, Certified Energy Analysts already perform many of the functions required by Section 120.8. As part of the normal compliance process, CEAs regularly review mechanical schedules, controls, lighting plans, envelope specifications, and other construction documents to verify consistency with the Energy Code and to identify missing information, discrepancies, and opportunities for improvement. They routinely communicate recommended revisions to architects, engineers, and contractors to resolve issues before permit issuance and construction. In practice, this type of review serves as a quality assurance function that enhances compliance and improves project outcomes.

The intent of Section 120.8 is not to require that the Design Reviewer be the engineer or architect of record, nor is the review intended to constitute the practice of architecture or engineering. Rather, the requirement establishes an independent review process intended to improve the quality and clarity of the construction documents and to promote compliance with California's Building Energy Efficiency Standards. The Design Reviewer is not creating the design or assuming responsibility for the design; instead, the reviewer is evaluating the documents from the perspective of code compliance, constructability, maintainability, and best practices.

Because the Design Review process is fundamentally a quality assurance and code compliance activity, demonstrated expertise in California's Energy Code should be the primary consideration in determining reviewer qualifications. CABEC Certified Energy Analysts possess specialized knowledge of Title 24 requirements and routinely provide the type of independent compliance review contemplated by Section 120.8. In many cases, CEAs identify potential compliance issues that might otherwise remain undiscovered until plan review, commissioning, or construction, thereby reducing delays and costly corrections.

Recognizing CEAs as qualified Design Reviewers would provide several benefits:

- Expand the pool of knowledgeable professionals available to perform Design Reviews.
- Improve the quality and consistency of Energy Code compliance documentation.
- Reduce plan review comments and construction-related corrections.
- Promote better coordination among project teams.

- Enhance compliance with California's Building Energy Efficiency Standards.
- Encourage the adoption of energy-efficient design best practices.
- Support the Commission's goals of improving building performance and ensuring effective implementation of Title 24 requirements.

The CEA certification signifies a recognized level of Energy Code knowledge, energy modeling proficiency, verified project experience, and a commitment to continuing education and ethical professional practice. Because CEAs possess demonstrated expertise directly related to the purpose and objectives of Design Review, they satisfy the underlying intent of Section 120.8. Accordingly, the Commission should expressly recognize CABEC Certified Energy Analysts as qualified Design Reviewers for purposes of signing the Design Review Kickoff Certificate(s) of Compliance and Construction Document Design Review Checklist Certificate(s) of Compliance specified in Part 1, Section 10-103(a)1.

Thank you for your consideration of this request and for your continued efforts to improve the effectiveness and implementation of California's Building Energy Efficiency Standards.

Sincerely,

Brian Selby

Selby Energy, Inc, CABEC Board of Directors President, Energy Code Ace SME/Instructor