

Saxton, Patrick@Energy

From: Saxton, Patrick@Energy
Sent: Wednesday, October 10, 2012 8:16 AM
To: 'farber-energy@sbcglobal.net'
Subject: Staff Response to Farber Energy Design Comment Regarding Adoption of CALGreen 15-Day Language TN-67307
Attachments: Staff Response to Farber Energy Design Comment Regarding Adoption of CALGreen 15-Day Language TN-67307.pdf

Hello Mr. Farber,

Thank you for your comments. Please find attached the staff response to your comments sent to docket # 12-BSTD-1 regarding adoption of CALGreen 15-day language.

Sincerely,

Patrick Saxton
California Energy Commission
916-651-0489

Hello Mr. Farber,

Thank you for your comments. Please find below the response to your comments sent to docket # 12-BSTD-1 regarding Adoption of CALGreen 15-Day Language.

During the development of the proposed 2013 Energy Provisions of CALGreen, significant consideration has been given to the granularity of the language, for specific building types and occupancies, for the voluntary performance standard for nonresidential buildings. Your participation in those discussions was highly valued and contributed to the proposed 15-day language. The reasoning behind the desire for additional Energy Budget reduction targets based on more narrowly defined building occupancies is well understood. However, it is felt that this approach would result in overly complex language for the proposed 2013 Energy Provisions of CALGreen.

CALGreen was initially developed and adopted in response to policy directives from the Governor, founded on statutory directives to address climate change.¹ The proposed 2013 Energy Provisions of CALGreen are voluntary and are meant to achieve exemplary levels of energy efficiency in order to support the goals of CALGreen. For some nonresidential building types and occupancies, a fixed percentage Energy Budget reduction which applies to all nonresidential buildings, such as those in the proposed 2013 Energy Provisions of CALGreen, may be more challenging due to a smaller number of energy systems present in a specific building or to lower capacity of the energy systems which are present. However, due to the voluntary nature of these provisions, the fact that any local jurisdiction wishing to adopt these voluntary provisions as requirements via local ordinance is required to do so at a public meeting², and the fact that any proposed local ordinance must be submitted to the Energy Commission for approval³, the Energy Commission believes that the proposed 2013 Energy Provisions of CALGreen are appropriate to meet the objectives and purposes of CALGreen and other supporting California energy policies.

There are two items of note which will help to further address specific nonresidential building types and occupancies. First, the Nonresidential Alternative Calculation Method (ACM) Reference Manual will clearly indicate that energy use components which are treated as equivalent in both the Standard Design Building and the Proposed Design Building, such as lighting in the dwelling units of high-rise residential buildings, should not be included when determining the percentage Energy Budget reduction for purposes of the voluntary performance standard for nonresidential buildings. Second, the Guide to the Nonresidential CALGreen Code document, for which the Energy Commission will be providing the content for the energy efficiency topics, is an opportunity to provide additional guidance on specific building types and occupancies.

¹ See CALGreen, *The 2010 California Green Building Standards Code Are you ready?*, pp. 2-3, available at: <http://www.documents.dgs.ca.gov/bsc/CALGreen/The-CALGreen-Story.pdf>.

² Public Resources Code § 25402.1, subd. (h)(2); Cal. Code Regs., tit. 24, part 6, § 10-106.

³ *Ibid.*

In response to your additional comments items:

1. Buildings consisting of multiple building function types, is an example of a specific building type and occupancy for which additional guidance will be provided in the Guide to the Nonresidential CALGreen Code document. The Energy Commission will be providing the content for the energy efficiency topics.
2. The proposed 2013 Energy Provisions of CALGreen would not be applicable to residential garage door openers because they are typically plug and cord devices which are not permanently installed.

Sincerely,

Patrick Saxton
California Energy Commission
916-651-0489