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| **Docket Number:** | 25-BSTD-03 |
| **Project Title:** | 2028 Energy Code Pre-Rulemaking. |
| **TN #:** | 271548 |
| **Document Title:** | CALCTP_2028_Proposal_AuditStandards_071726 |
| **Description:** | Lighting Controls ATT and ATE Equitable Audit Process |
| **Filer:** | Holly McAllister |
| **Organization:** | CALCTP |
| **Submitter Role:** | Applicant |
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*In the matter of 2028 Building Energy Efficiency Standards Pre-Rulemaking*

**Docket No. 25-BSTD-03**

**Proposed Measure Name:** Lighting Controls ATT and ATE Equitable Audit Process

**Submitted By:** Holly McAllister – CALCTP/NALCTP Administrator

**Submitted To:** California Energy Commission Docket Unit, 1516 Ninth Street, MS-4, Sacramento, CA 95814

**Submission Date:** July 17, 2026

## Summary Table

| Required Summary Element | Response |
|---|---|
| Measure Name & Proponent | Lighting Controls ATT and ATE Equitable Audit Process |
| Building Type | Non-residential |
| Building System | Lighting Controls |
| Measure Description | This measure proposes four modifications to the audit requirements under Section 10-103.1(c)3F: (1) correcting the Desk Audit selection from completed compliance forms to completed projects; (2) adjusts Desk Audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period; (3) correcting the Site Audit selection from completed acceptance test to completed projects; (4) adjusts Site Audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period. |
| Justification | Current language requires audit selection based on a percentage of compliance form and acceptance test submissions. This creates logistical burden on ATTCPs as submissions are submitted at the project level by technicians. A five percent sampling rate achieves quality oversight while providing a more complete picture of Title 24 compliance. |
| Data Needs | Review of modification to Section 10-103.1(c)3F |
| Key Stakeholders | ATTCPs, ATTs, ATEs, AHJs, Construction Teams |
| Estimate Energy Savings | N/A |
| Estimated Costs | There is no cost increase in the measure proposal. |
| Economic Impacts | There is no economic impact. |
| Consideration for Readiness | High |

CALCTP

## Proposed Measure

This measure proposes four modifications to the audit requirements under Section 10-103.1(c)3F.
First, it corrects a selection error in the Desk Audit provision, replacing audit selection from completed compliance forms to completed projects (calculated per building permit) to accurately reflect how submissions are completed by the ATTs and reviewed by the AHJs. Second, it updates desk audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period. Third, it corrects the selection process for the Site Audit provision as well, replacing audit selection from completed acceptance test to completed projects (calculated per building permit). Fourth, it updates site audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period.

## Building Types

All non-residential and multifamily housing taller than 4 stories, including schools (excluding buildings affected by AB-130).

## Building Systems

Compliance requirements for installation and verification of lighting control systems related to Title 24 energy compliance for non-residential buildings.

## Key Stakeholders

CEC, ATTCPs, ATTs, ATEs, and construction teams.

## Measure Summary

This measure proposes four modifications to the audit requirements under Section 10-103.1(c)3F.
First, it corrects a selection error in the Desk Audit provision, replacing audit selection from completed compliance forms to completed projects (calculated per building permit) to accurately reflect how submissions are completed by the ATTs and reviewed by the AHJs. Second, it updates desk audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period. Third, it corrects the selection process for the Site Audit provision as well, replacing audit selection from completed acceptance test to completed projects (calculated per building permit). Once again, considering how submissions are completed by the ATTs through the ATTCPs portals and reviewed by the AHJs.
Fourth, it updates site audit selection from one to five percent (5%) of each ATT's completed projects per annual reporting period.
A five percent sampling rate achieves quality oversight while providing a more complete picture of Title 24 compliance.

## Measure Description

**Equitable Program Audit**
**Program Audit:** The ATTCP shall include quality assurance and accountability measures, including but not limited to independent oversight of the certification materials, processes and procedures, visits to building sites where certified technicians are completing acceptance tests, certification process evaluations, and expert review of the training curricula developed for Building Energy Efficiency Standards, Section 130.4 and 160.5(e). Independent oversight may be demonstrated by accreditation under the ISO/IEC 17024 standard.

**Desk Audit:** The ATTCP shall review a random sample of no less than five percent (5%) of each ATT's completed projects (calculated per building permit) within one annual reporting period. For ATTs submitting fewer than five (5) projects annually, a minimum of one (1) desk review will be conducted. The ATTCP may engage in additional checks at its discretion.

**Shadow Audit:** The ATTCP shall perform shadow audits by meeting either of the following options.

**Site Audit:** The ATTCP shall perform randomly selected on-site audits of no less than five percent (5%) of each ATT's completed projects (calculated per building permit) within one annual reporting period.

**Training Facility Audit:** The ATTCP shall shadow audit each ATT at an ATTCP training facility at least once per code cycle where the ATTCP shall observe the performance of the ATT on at least five functional tests for which the ATT is certified. The shadow audit must replicate field conditions for installed equipment and controls in a building. The ATTCP training facility shall be setup to allow auditing of all functional tests for which the ATT is certified. The shadow audits must be in addition to any testing used for ATT recertification.

## Justification

The current desk audit and site audit language directs audit selection to be made based on individual form submissions. This creates a significant and disproportionate logistical burden to maintain compliance standards as ATT's submissions within ATTCPs portals are submitted on a project level based on permit number. A five percent sampling rate at the project level achieves equivalent quality oversight. Due to the size and scope of a given permitted project, a large variance in the number of completed compliance forms and acceptance tests occur. If sampling is utilized by the ATT, this variance can widen per project. Audit selection and corresponding annual reporting that is based on anything other than the project level has the potential to skew analytical data review at the state level by not providing a complete picture of Title 24 compliance at the city and county level.

## Data Needs

Review of modification to Section 10-103.1(c)3F.

## Estimated Energy Savings

Not applicable.

## Estimated Cost

There is no cost increase in the measure proposal.

## Economic Impacts

There is no economic impact.

## Market Readiness and Support

This proposal assumes high market readiness. California's Title 24 compliance infrastructure already supports desk audits and site audits. The modifications proposed here prioritize quality assurance and accountability measures to be directly correlated to the total number of projects completed within the state over the code cycle. This will standardize annual reporting to reflect the actual number of Title 24 compliant jobs that are audited versus a form-based approach. This is proposed to reflect ATTCP's systems and processes.

## Code Language Proposed

Section 10-103.1(c)3F

F. Quality Assurance and Accountability. The ATTCP shall describe in its application to the Energy Commission its procedures for conducting quality assurance and accountability activities, including but not limited to the following:

i. Program Audit: The ATTCP shall include quality assurance and accountability measures, including but not limited to independent oversight of the certification materials, processes and procedures, visits to building sites where certified technicians are completing acceptance tests, certification process evaluations, and expert review of the training curricula developed for Building Energy Efficiency Standards, Section 130.4 and 160.5(e). Independent oversight may be demonstrated by accreditation under the ISO/IEC 17024 standard.

ii. Desk Audit: The ATTCP shall review a random sample of no less than ~~1~~ five percent (5%) of each ATT's completed ~~compliance forms~~ projects (calculated per building permit) within one ~~code cycle~~ annual reporting period. For ATTs submitting fewer than five (5) projects annually, a minimum of one (1) desk review will be conducted. The ATTCP may engage in additional checks at its discretion.

iii. Shadow Audit: The ATTCP shall perform audits by meeting either of the following options:

   i. Site Audit: The ATTCP shall perform randomly selected on-site audits of no less than ~~1~~ five percent (5%) of each ATT's completed ~~compliance forms~~ projects (calculated per building permit) within one ~~code cycle~~ annual reporting period.

   ii. Training Facility Audit: The ATTCP shall shadow audit each ATT at an ATTCP training facility at least once per code cycle where the ATTCP shall observe the performance of the ATT on at least five functional tests for which the ATT is certified. The shadow audit must replicate field conditions for installed equipment and controls in a building. The ATTCP training facility shall be setup to allow auditing of all functional tests for which the ATT is certified. The shadow audits must be in addition to any testing used for ATT recertification.