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Gabel Energy's Comments on 2028 Presentationâ€™ 2028 Code Compliance Complexity Considering AB-130

Thank you for the clarifying presentation. Attached is a letter with Gabel Energy's comments on the presentation.

Additional submitted attachment is included below.



July 17, 2026

To CEC Staff,

Topic: 2028 Complexity Considering AB-130

After attending the pre-rulemaking staff workshops on the 2028 Energy Code on 6/23/26 through 6/25/26 I have the following concerns regarding the proposed procedures to show compliance to the 2028 Energy Code. Understanding that AB-130 restricts the updates of the Energy Code regarding residential occupancies, there were mentions on projects that will show compliance with this restriction and limitations.

1. Forms

It was suggested that residential occupancies may be required to use the 2025 Energy Code compliance forms for compliance while only nonresidential occupancies will use the 2028 Code compliance forms.

2. Performance Software

Similarly, it was suggested that residential occupancies may be required to use the 2025 Energy Code performance software for compliance while only nonresidential occupancies will use the 2028 Code performance software.

Please reconsider this stance and allow all occupancies to produce 2028 compliance forms and all occupancies to utilize the same 2028 compliance software. Splitting out forms by code cycle will lead to industry confusion, project timeline disruption, and overall loss of confidence in the Energy Code. This would be especially confusing for mixed-use multifamily projects that would potentially be required to submit 2 sets of forms in 2 separate code cycles.

Instead, please consider utilizing the exact same 2025 compliance forms with 2028 code cycle name updates and the same 2025 performance software coding within the 2028 software package.

Please feel free to reach out if you have any questions or require clarification regarding the matters raised in this filing.

Sincerely,



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