

DOCKETED

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Gabel Energy's Comments on 2028 Presentationâ€™ Sampling and Install Certificate Updates

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: Session – 6/25/26 Sampling and Install Certificate Updates

After attending the pre-rulemaking staff workshop on the 2028 Energy Code on Day 3 (6/25/26), I have the following concerns:

Please clarify the language regarding the definition of “homes” on the Graduated Sampling , Slide 55of the presentation (shown below).



Proposal Description – Graduated Sampling

- Limited to projects greater than 40 homes.
- First 10 homes must be 100% tested.
- The builder may graduate to sampling with consistent performance.
- Sample group ratio limited to 1:4 per plan type.
- Installer certificates verified by ECC Rater.
- Enhanced regulation, quality assurance, and oversight.

1. There is currently no definition of “home” within the Energy Code. Should this be “dwelling units” in lieu of homes?
2. If meant for dwelling units, is this clarification only for single family projects or multifamily projects with 40 or more dwelling units or any project type with 40 or more dwelling units.

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

Sincerely,

A handwritten signature in black ink that reads 'Marina Blanco'.

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