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GreenPoint Rated Comments on the Draft California Building Energy Performance Strategy Report

GreenPoint Rated appreciates the opportunity to comment on the Draft California Building Energy Performance Strategy Report. We support the California Energy Commission's™ recommendation to establish a statewide Building Performance Standard and its emphasis on affordability, tenant protections, and flexible compliance pathways. We encourage the state to ensure that large multifamily residential buildings are addressed through clear, practical, and multifamily-specific implementation guidance.

GreenPoint Rated, administered by Habinex, Inc., is a California-based residential green building certification program with experience in multifamily housing, standardized documentation, trained Raters, field verification, and program-level quality assurance. Based on that experience, we believe a future statewide BPS should recognize the distinct characteristics of large multifamily and affordable housing, including metering arrangements, central and unit-level systems, ownership structures, tenant impacts, financing constraints, retrofit timing, and field-level implementation challenges.

Our attached comments focus on five recommendations:

1. Build on the proposed property-type approach by developing multifamily-specific targets, adjustment criteria, verification protocols, and implementation guidance.
2. Design verification and documentation requirements to be practical and scalable. The CEC should distinguish licensed-professional verification of benchmarking data from field verification of building conditions and completed improvements and allow appropriate supporting roles for trained residential professionals and qualified third-party certification programs within defined quality-assurance frameworks.
3. Provide phased, documented compliance pathways for deed-restricted and naturally occurring affordable housing that account for funding and capital cycles, tenant protections, electrical capacity, utility coordination, equipment replacement timing, and retrofit feasibility.
4. Ensure technical-assistance programs and resource hubs include residential and multifamily expertise and help owners develop scopes of work, sequence improvements, coordinate financing and incentives, document completed work, and communicate with residents.
5. Advance energy efficiency, electrification, greenhouse gas reduction, and load-flexibility goals while also recognizing resident benefits such as indoor air quality,

August 20, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

**Re: GreenPoint Rated Comments on the Draft California Building Energy Performance Strategy Report
Docket 24-BPS-01**

Dear Commissioners and CEC Staff,

GreenPoint Rated appreciates the opportunity to provide comments on the Draft California Building Energy Performance Strategy Report prepared pursuant to Senate Bill 48. We support the California Energy Commission's recommendation to establish a thoughtful statewide Building Performance Standard that can improve building performance, reduce greenhouse gas emissions, support affordability, and advance practical implementation across California's existing building stock.

GreenPoint Rated is a California-based residential green building rating and verification framework with experience in multifamily housing, third-party project documentation, rater-supported verification, and practical implementation of residential sustainability measures. Based on that experience, our comments focus on making a future statewide Building Performance Standard workable for large multifamily residential buildings, affordable housing, building owners, tenants, and the professional networks that will be needed to support implementation.

1. Establish multifamily-specific implementation guidance

We support the Draft Strategy Report's recommendation to establish final performance targets by property type. Building on that approach, future legislation and rulemaking should develop multifamily-specific targets, adjustment criteria, verification protocols, and implementation guidance that reflect the diversity of California's multifamily building stock.

Multifamily housing has distinct ownership and metering structures, resident impacts, central and unit-level building systems, financing constraints, tenant considerations, and retrofit challenges. These considerations are especially important for affordable housing, older multifamily housing, deed-restricted projects, and buildings serving lower-income residents. A future statewide BPS should include clear multifamily-specific guidance on baselines, targets, adjustment pathways, compliance schedules, tenant protections, and technical assistance.

2. Design verification and documentation to be practical and scalable

Accurate benchmarking and data verification will be important to fair implementation. At the same time, statewide implementation must be scalable. The Draft Strategy Report recommends licensed-professional verification of benchmarking data at key evaluation years but acknowledges that on-site verification of every covered building is not feasible. We encourage the CEC to consider a layered verification model that distinguishes benchmarking-data verification from field verification of building conditions and completed improvements. Licensed-professional attestation should remain where required, while qualified third-party verifiers and trained residential Raters could support field documentation and project verification.

For large multifamily buildings, trained residential verification professionals may be well-positioned to support field documentation and review of building characteristics, common-area and residential energy-use considerations, central water-heating and HVAC systems, ventilation, electrification measures, completed retrofit scope, and documentation needed for owner support and program QA.

3. Account for affordable housing and tenant impacts

GreenPoint Rated supports the Draft Strategy Report's recommendation to allow affordable housing, financial hardship, and technical infeasibility to qualify for alternative compliance pathways. In designing these pathways, the CEC should consider the real constraints that multifamily and affordable housing owners face, including tax-credit and public funding cycles, reserve limitations, capital planning, tenant disruption, resident relocation risk, split incentives, equipment replacement timing, central-system feasibility, electrical capacity, and utility incentive coordination.

Building on the report's recommended alternative compliance pathways, future program design should provide affordable housing with phased, documented compliance options aligned with public-funding and capital cycles, equipment useful life, electrical capacity, and retrofit feasibility, while protecting tenants and maintaining progress toward long-term performance targets.

A future BPS should avoid creating a compliance burden that threatens housing stability or redirects limited project resources away from resident needs. Flexibility should preserve the state's energy and emissions goals while recognizing financial hardship, affordable housing status, technical infeasibility, and tenant protection needs.

4. Build residential implementation expertise into technical assistance and resource hubs

Technical assistance should go beyond benchmarking and target-setting. Multifamily owners will need help translating performance requirements into feasible scopes of work, sequencing retrofit measures, coordinating incentives and financing, documenting completed improvements, and communicating with residents.

Any statewide resource hub, technical assistance program, or implementation network should include organizations and professionals with residential and multifamily expertise, not only commercial benchmarking or energy-management expertise.

5. Preserve broader resident benefits

BPS implementation should support energy efficiency, building electrification, greenhouse gas reductions, and load flexibility while also considering resident-facing outcomes such as indoor air quality, thermal comfort, resilience, water efficiency, durability, and health.

This is particularly important in multifamily housing, where energy measures can directly affect residents. Integrated scopes of work can help owners meet performance goals while also improving housing quality and resident outcomes.

Because the statewide BPS would likely require future legislation and additional program design, we encourage the CEC to engage residential, multifamily, affordable housing, and third-party verification stakeholders early in the next phase.

GreenPoint Rated would welcome the opportunity to provide additional feedback or participate in future stakeholder discussions related to large multifamily implementation, residential verification, affordable housing compliance pathways, Rater and verifier workforce capacity, and practical owner support.

A statewide BPS can be a powerful policy tool, but its success will depend on whether it can be translated into clear, fair, and practical implementation at the building level. GreenPoint Rated encourages the CEC to ensure that residential and multifamily implementation expertise is represented as the strategy moves toward future legislation, rulemaking, technical assistance, and program design.

Thank you for the opportunity to provide comments.

Respectfully submitted,

Vaidehi Seth

Executive Director

Habinex, Inc. / GreenPoint Rated