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Submitted On: 8/21/2026
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3C-REN_CEC Draft BPS Performance Strategy Report Comments

Additional submitted attachment is included below.



Comments Due August 21st, 2026
California Energy Commission
Docket Unit, MS-4
Re: **Docket No. 24-BPS-01**
715 P Street Sacramento, California 95814

Dear Commissioners and Staff,

The Tri-County Regional Energy Network (3C-REN) is pleased to submit these comments as part of the public comment period for the Draft California Building Energy Performance Strategy Report. The Tri-County Regional Energy Network (3C-REN) is a collaboration among three California Central Coast counties (San Luis Obispo, Santa Barbara, and Ventura) established to deliver energy-saving programs and industry trainings that help reduce energy use, strengthen local job markets, and support efforts to achieve climate goals. 3C-REN's locally managed energy-saving programs and services are designed to address existing gaps in current programs and meet the needs of local government agencies, building professionals, and residents throughout the region.

3C-REN appreciates the California Energy Commission's (CEC) comprehensive evaluation of how California can improve the performance of its existing building stock. We support the report's recognition that building performance standards (BPS) should complement California's existing Energy Code, benchmarking requirements, incentive programs, and local building decarbonization efforts.

As the CEC further develops its recommendations and future legislative and regulatory processes move forward, 3C-REN encourages the Commission to consider how a statewide BPS can be strengthened through existing regional and local programs that already provide workforce training, technical assistance, education, and direct support to building owners and industry professionals.

[A Statewide BPS Framework With Clear State, Local, and Regional Roles](#)

3C-REN supports the CEC's goal of establishing a BPS framework that is consistent, understandable, and administratively feasible for building owners. A statewide framework can



provide common metrics, targets, reporting expectations, and compliance requirements while still preserving an important role for local governments and Regional Energy Networks.

3C-REN encourages the CEC to clearly define how state, local, and regional entities will work together as the BPS framework develops. Local governments and RENs can provide valuable regional knowledge, stakeholder relationships, and implementation experience that complement statewide administration.

For buildings outside the scope of a future statewide BPS, the CEC should also consider how elements of the statewide framework could serve as a consistent model for local policies. This could reduce conflicting requirements while allowing local jurisdictions to address smaller buildings and locally identified priorities.

[Leverage Existing Programs to Support Building Owners](#)

A performance requirement alone will not ensure successful implementation. Building owners will need support understanding their performance requirements, identifying appropriate improvements, navigating incentives and financing, and planning projects around capital and equipment-replacement cycles.

3C-REN encourages the CEC to coordinate BPS implementation with existing energy-efficiency programs administered by RENs, utilities, community choice aggregators, and other program administrators. These programs already provide technical assistance, customer education, contractor engagement, incentives, and project support that could be aligned with future BPS requirements.

The CEC should establish a formal coordination structure with program administrators early in BPS development so that building-owner support is available before compliance deadlines take effect.

[Workforce and Market Capacity Needed for Implementation](#)

A statewide BPS covering tens of thousands of buildings will create substantial demand for professionals with expertise in benchmarking, energy auditing, commissioning, controls, HVAC, electrification, building envelopes, data verification, and building operations.

3C-REN recommends that workforce development and market readiness be incorporated into BPS planning from the beginning. RENs are well positioned to support this effort because they



already provide training and education to building professionals and maintain established relationships with contractors, local governments, and industry stakeholders.

The CEC should work closely with RENs and other workforce partners to identify anticipated skill and capacity gaps, develop targeted training, and ensure that the market is prepared well in advance of the first compliance deadlines. These efforts should also support SB 48's objective of expanding equitable access to jobs and economic opportunities created by building upgrades.

Conclusion

A statewide BPS has the potential to fill an important gap in California building policy by connecting Energy Code requirements at construction with measurable performance throughout the useful life of existing buildings. Achieving that potential will require more than establishing performance targets. It will require a coordinated implementation system that helps building owners understand the requirements and successfully make improvements.

3C-REN encourages the CEC to maintain strong partnerships with local governments and Regional Energy Networks as the BPS framework develops. Future requirements should be coordinated with existing energy-efficiency programs, technical assistance, incentives, and workforce-development efforts. Early partnership with RENs can help ensure that building-owner support, industry training, and market capacity are available when they are needed.

3C-REN appreciates the CEC's thoughtful work on the Draft California Building Energy Performance Strategy Report and looks forward to continued collaboration as these recommendations move into future legislative, regulatory, and program-development processes.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ar. Kelly", is written below the "Sincerely," text.



TRI-COUNTY REGIONAL ENERGY NETWORK

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