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City of Santa Monica Comments

Additional submitted attachment is included below.



City Manager's Office | Office of Sustainability and the Environment

August 20th, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814 US
Submitted via CEC online Docket Portal: Docket Number 24-BPS-01

Re: Comments of the City of Santa Monica on the Draft California Building Energy Performance Strategy Report (Docket No. 24-BPS-01)

Dear Chair and Commissioners:

On behalf of the City of Santa Monica, thank you for the opportunity to comment on the Draft California Building Energy Performance Strategy Report ("Draft Report"), developed pursuant to Senate Bill 48 (Becker, Chapter 378, Statutes of 2023) and Docket No. 24-BPS-01. The City commends the California Energy Commission (CEC) for the thoroughness, transparency, and stakeholder engagement that has characterized this process, including the Request for Information, the Technical Advisory Working Group meetings, and the recent public workshop. The Draft Report reflects a well-researched effort to establish a statewide framework for using benchmarking data to reduce building energy use and greenhouse gas emissions.

Santa Monica has long been a leader in local climate action. Through our Climate Action and Adaptation Plan, the City has set an ambitious goal of carbon neutrality and has been actively developing a local Building Performance Standards (BPS) ordinance to reduce emissions from our building sector. We view the CEC's statewide strategy and Santa Monica's local policy work as complementary, however, the current recommendations could impede local BPS implementation efforts.

The City has been working collaboratively with other regional jurisdictions such as the City of West Hollywood, LA County and others as part of the USGBC California BPS Peer-Learning Collaborative (CalBPS) to assess how a statewide BPS might best support local jurisdictions as they pursue BPS policies. With that context, the City respectfully offers the following recommendations.

1. Adopt a Local Program Exemption for the Largest Covered Buildings

- The Draft Report proposes that the CEC directly administer benchmarking and compliance for the largest covered buildings (50,000 square feet and above). If the



CEC's statewide targets or timelines for these large buildings are less ambitious or differ from local requirements, and local governments currently developing BPS policies decide to wait for the state requirements to take effect, requiring state administration could inadvertently delay local progress rather than accelerate it.

- To resolve this tension, we recommend the CEC adopt a local program exemption for jurisdictions that meet defined minimum criteria such as square footage and/or minimum compliance targets. This "grandfathering-in" approach would preserve the state's ambition to reduce carbon emissions from the largest buildings, while allowing jurisdictions with more ambitious local targets to keep pace with their own climate commitments.

2. Expand Utility Billing Data Verification to All Covered Buildings

- We strongly support the Draft Report's recommendation that the CEC use utility billing data to independently verify buildings' self-reported benchmarking data. This is one of the most valuable tools in the Draft Report, and Santa Monica encourages the CEC to apply it across all covered buildings, including those below 50,000 square feet. Statewide utility-data verification would reduce the administrative burden on implementing jurisdictions and the financial and staff-time burden on covered building owners, without requiring the state to take over direct administration of buildings that local governments are already equipped to manage.

3. Fund Technical Assistance and Capacity-Building for Local Governments

- Many California jurisdictions have identified local BPS policies as a key strategy to meet their climate goals, but face capacity constraints for policy development, implementation, and enforcement. The City recommends that the CEC include a specific recommendation that the state fund technical assistance, model ordinance language, and staff capacity grants to support local governments. An example of this could be a model code for jurisdictions interested in "reaching" beyond the statewide minimum square threshold to include properties between 20-50k square feet in their own local BPS policies. This could be a similar approach to the CALGreen voluntary requirements (Tier 1 and Tier 2), which allows cities to adopt building standards that are more advanced than the minimum state requirements.

4. Streamline the Statewide BPS Administration Platform with Local Jurisdictions

- To further avoid a patchwork of local & statewide BPS requirements, the City recommends that the CEC explore options to identify and implement a uniform



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BPS reporting platform for both statewide and local BPS administration. To further support local jurisdictions in implementing their own policies, the state could offer local subscriptions to the selected state platform.

The City of Santa Monica is grateful for the opportunity to contribute to the development of this important work.

Sincerely,

Shannon Parry
Chief Sustainability Officer
City of Santa Monica

Shannon Parry