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PIMA Supports Energy Efficiency First Approach in BPS Strategy Report (24-BPS-01)

Additional submitted attachment is included below.

PIMA
POLYISOCYANURATE INSULATION MANUFACTURERS ASSOCIATION

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Submitted via E-File

August 21, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Building Energy Performance Strategy Report
Docket No. 24-BPS-01

The Polyisocyanurate Insulation Manufacturers Association[1] (PIMA) appreciates the opportunity to comment on the California Energy Commission's (CEC) Building Energy Performance Strategy Report (Report) and applauds the CEC for its work and public engagement on this topic. We are encouraged by the CEC's commitment to address the inefficiencies of the State's existing building stock through the adoption of a state-wide Building Performance Standard for large commercial and residential buildings.

PIMA members manufacturer polyisocyanurate (polyiso) insulation across North America providing an energy-efficient solution for the building envelope. Polyiso products are most widely used as roof insulation for commercial buildings with a significant amount installed each year on existing buildings through reroofing projects. As a result, polyiso products and reroofing activities are one of the most common retrofit projects completed on existing buildings that impact energy use. For many buildings, an energy-efficient roof replacement (i.e., adding insulation when the existing roof system is removed and replaced) can reduce whole-building energy use and associated emissions by up to 10% annually or more.[2]

Site energy use intensity is an appropriate metric for California's Building Performance Standard.

PIMA supports the inclusion of site energy use intensity (EUI) as one of the recognized metrics. The EUI metric will appropriately encourage building owners to prioritize early investments in energy efficiency improvements. In most instances, energy efficiency improvements, such as roof replacements, will offer a cost-effective path for compliance.

[1] www.polyiso.org
[2] https://www.polyiso.org/page/EnergyCarbonSavingsAnalysis

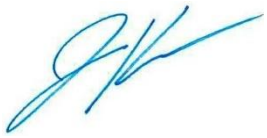
Additionally, the improvements will enable building owners to leverage other technologies in the future to meet longer-term targets established under the Building Performance Standard. The Report also recognizes the connection between energy efficiency and the State's goal of reducing the environmental impacts associated with building operations.

California should adopt an "efficiency first" approach to the development and implementation of the Building Performance Standard regulations.

PIMA encourages the CEC to adopt an "efficiency first" approach when establishing other components of the Building Performance Standard, including compliance pathways as well as guidance materials for building owners. The early adoption of energy efficiency improvements provides immediate benefits to owners and tenants at the lowest cost, while also reducing the long-term compliance costs for buildings when future targets are considered.

PIMA looks forward to continuing its role as an active participant in the development of the state-wide Building Performance Standard. Please contact me at jkoscher@pima.org should additional information be helpful to the process.

Sincerely,



Justin Koscher
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