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City of San Diego Comments - Draft Building Energy Performance Strategy Report

Additional submitted attachment is included below.

August 21, 2026

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: **Docket No. 24-BPS-01; Draft California Building Energy Performance Strategy Report**

Dear Commissioners:

Thank you for the opportunity to comment on the Draft California Building Energy Performance Strategy Report prepared pursuant to Senate Bill 48. The City of San Diego respectfully submits the following comments to support the development of a clear, equitable, and effective statewide building performance standard. A well-designed statewide standard will advance the City's goals to deliver cleaner air, improved public health, lower energy costs for households and businesses and meaningful reductions in climate pollution.

Comments on the Draft California Building Energy Performance Strategy Report

- **Statewide regulatory consistency.** The City agrees that a statewide building performance standard provides needed regulatory certainty and avoids the complexity and administrative inefficiency of a patchwork of varying local requirements. The City supports a minimum statewide building size threshold that maximizes the potential for reductions in climate emissions and the number of San Diegans and other Californians that benefit from improved building performance. At a minimum, a statewide building performance standard should apply to buildings covered by the state's existing energy benchmarking law (e.g., residential and commercial buildings greater than 50,000 square feet), as recommended in the Draft Report.

The City also supports lowering the minimum building size threshold, on a statewide basis, to buildings smaller than 50,000 square feet, to increase the potential impact of a building performance standard, to the extent it is feasible and practical to do so. However, based on our review of the Draft Report, the Commission has found that the disproportionately higher administrative costs and needs associated with smaller buildings make it infeasible or impractical to lower the minimum building size threshold below 50,000 square feet. For example, the Draft Report states that, (1) smaller buildings (10,000 square feet to 50,000 square feet) need more administrative support to complete energy benchmarking; (2) lowering the benchmarking size threshold to 25,000 square feet would more than double the administrative needs of a statewide benchmarking program; (3) making "smaller" buildings also subject to a performance standard would add even more administrative costs to the implementing agency; and (4) lowering the minimum building size threshold of a statewide program to 25,000 square feet would double the number of covered buildings but increase the amount of covered building square footage by only 20 percent. Administrative support includes communications and outreach, compliance assistance, data quality review, exemption processing and enforcement.

The City supports the Commission's consideration of the administrative resources needed for effective implementation of a statewide building performance standard. However, the City does not support the Commission's recommendation to "encourage and authorize" local jurisdictions to set standards for smaller buildings and take on the associated higher administrative needs and costs. Doing so would result in inefficient use of limited local jurisdiction resources and create a patchwork of varying local requirements for smaller buildings that the Commission appropriately seeks to avoid for large buildings. Given the statewide – and global – reach of climate change, we strongly encourage the State to set the appropriate standards to avoid redundancies and overall governmental inefficiencies.

- **Energy costs and rents.** The City supports a statewide standard that protects against increased utility bills and rental costs.
- **Protections for housing affordability and tenant protections.** Building performance improvements must not come at the expense of renters or vulnerable residents, and the standard should guard against displacement and cost-shifting.
- **Cost-effective for building owners and tenants.** The statewide standard should minimize upfront costs, help reduce utility bills, and allow for affordable compliance options across diverse building types and geographies, including disadvantaged communities.
- **Align with existing and new funding programs.** Coordination with existing and new funding programs is essential to reduce compliance costs, accelerate upgrades and support disadvantaged communities.
- **Workforce development programs.** A statewide standard should strengthen the clean energy and building-performance workforce, create high-quality jobs and support training pipelines that prepare skilled and trained workers for long-term careers.
- **Building Performance Metrics.** In addition to primary performance metrics for building energy use and greenhouse gas emissions, the City also supports metrics that prioritize overall occupant well-being such as indoor air quality and thermal comfort as well as demand management metrics that reduce strain on the electric grid and support lower energy costs for residents and businesses.
- **Exempted Local Benchmarking Ordinances.** The City looks forward to future opportunities to coordinate with the Commission and others to understand how a future statewide benchmarking performance standard would affect the City's existing local benchmarking program. The City is especially interested in discussing opportunities to make benchmarking more efficient and effective at the State level.

Thank you for considering these comments. The City of San Diego remains committed to supporting the development of a statewide building performance standard that improves air quality, reduces climate pollution, enhances building comfort and health, lowers energy costs, and promotes affordability, workforce development, and accurate data reporting while aligning with statewide climate and funding priorities.

Sincerely,

Andrew Martin
Chief Sustainability Officer
City of San Diego City Planning Department