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Harmonization with Appliance Standards

Arup supports the CEC's efforts to develop a statewide Building Performance Standard that drives long-term decarbonization of California's building stock. As the program develops, we encourage the Commission to more explicitly consider how statewide BPS requirements interact with appliance standards and emissions regulations that already affect building owners.

Existing regulations, including BAAQMD 9-4 and 9-6, SCAQMD Rule 1146.2 and emerging CARB appliance standards, are already influencing equipment replacement decisions by requiring lower- or zero-emission technologies at end of life. The statewide BPS presents an opportunity to ensure that these investments also advance future BPS compliance.

We recommend that the Commission evaluate whether compliance with appliance standards can be recognized as a supportive pathway toward future BPS targets, particularly if on-site greenhouse gas emissions are incorporated into the final performance metric. In addition, we encourage coordination between the CEC, CARB, and local air districts to provide consistent market signals regarding equipment replacement, emissions reductions, and building performance outcomes.

Without intentional alignment, building owners may face a patchwork of requirements that share similar decarbonization goals but do not clearly reinforce one another. California has an opportunity to create a more coherent compliance pathway by ensuring that appliance regulations and BPS requirements work together as part of a broader building decarbonization strategy