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CalMTA Comments on Draft BPS Strategy Report

Additional submitted attachment is included below.

Aug 25, 2026

California Energy Commission
Docket No. 24-BPS-01
715 P Street
Sacramento, CA 95814

Re: CalMTA Comments on Draft California Building Energy Performance Strategy Report

Dear Commissioners and CEC Staff:

The California Market Transformation Administrator (CalMTA) appreciates the opportunity to comment on the California Energy Commission's Draft California Building Energy Performance Strategy Report and the potential development of a statewide building performance standards (BPS) policy. We also appreciate the CEC's leadership in advancing a thoughtful and comprehensive framework to improve building energy performance statewide.

CalMTA is a statewide, ratepayer-funded energy efficiency market transformation program administered by Resource Innovations on behalf of the California Public Utilities Commission (CPUC). As the CEC moves from strategy development toward potential rulemaking, CalMTA can inform policy design with market intelligence and support rollout by helping build the technology, financing, workforce, service-delivery, customer, and tenant engagement conditions needed for successful implementation.

CalMTA supports the report's emphasis on a statewide BPS framework for large commercial and multifamily buildings that provides clear long-term market direction while allowing phased implementation. CalMTA particularly supports clear long-term performance targets with interim checkpoints; initial use of site Energy Use Intensity (EUI) and site Greenhouse Gas Intensity (GHGI), with continued evaluation of demand-management and grid-flexibility metrics; stronger benchmarking, data quality, and verification requirements; flexible compliance pathways; and technical assistance, financial support, tenant protections, and equity-centered implementation.

Together, these elements can create a clear market signal while accommodating differences among buildings and advancing affordability and equity. Predictable expectations can stimulate demand for efficient, low-emissions technologies, while CalMTA's initiatives can help expand the tools, data, financing approaches, and service-delivery models needed for implementation.

CalMTA's proposed Commercial Replacement and Attachment Window Solutions (CRAWS) and Commercial Rooftop Units (CRTUs) initiatives, together with the developing Commercial Building Efficiency Accelerator (CBEA) initiative, can provide practical insight into building envelope upgrades, rooftop units, advanced controls, electrification readiness, demand flexibility, whole-building efficiency, workforce preparation, and financing needed to support BPS development and future implementation.

Across rulemaking and rollout, CalMTA can contribute in six priority areas:

1. **Metric design and data readiness.** Provide market insight on how site GHGI, site EUI, benchmarking data, and future demand-flexibility metrics may translate into administrable requirements, including data quality, utility reporting, tenant-meter issues, and readiness.
2. **Commercial market intelligence.** Draw on findings from CRAWS, CRTU, and CBEA—including market engagement, demonstrations, technology assessments, and service-provider feedback—to identify scalable equipment, controls, demand-flexibility, and whole-building strategies.
3. **Implementation barriers and readiness.** Identify technology, contractor, workforce, financing, service-delivery, customer-awareness, and adoption barriers early enough to inform realistic timelines, technical assistance, compliance pathways, and program design.
4. **Incentive, financing, and compliance pathway alignment.** Help align incentives, financing, technical assistance, and alternative pathways to reduce first-cost barriers, encourage earlier action, and support buildings facing greater challenges.
5. **Tenant protections, split-incentive solutions, and equity outcomes.** Assess potential effects on low-income residential and small commercial tenants, affordable housing, and tenant-serving buildings in environmental and social justice (ESJ) communities. Relevant interventions may include trusted-messenger outreach, green lease tools, tenant data-sharing protocols, targeted support, and equity tracking.
6. **Outcome tracking and market progress indicators.** Help evaluate adoption, tenant impacts, workforce development, and lasting market change by aligning CalMTA indicators, milestones, and data tracking with future BPS needs while reducing duplicative collection and administrative costs.

This work can help ensure that future BPS requirements are informed by practical market conditions and supported by complementary interventions.

We welcome the opportunity to work with the CEC and stakeholders throughout rulemaking and implementation to help translate a strong BPS framework into practical, equitable, and effective market outcomes.

Respectfully submitted,

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About CalMTA

CalMTA is a program of the California Public Utilities Commission and is administered by Resource Innovations. We work to deliver cost-effective energy efficiency and decarbonization benefits to Californians through a unique approach called market transformation. Market transformation is the strategic process of intervening in a market to create lasting change by removing market barriers or exploiting opportunities, accelerating the adoption of identified technologies or practices. CalMTA-developed market transformation initiatives also aim to advance state goals on demand flexibility, workforce development and equity. Learn more at www.calmta.org.

- Commercial Rooftop Units (RTU) - CalMTA
- Commercial Replacement & Attachment Window Solutions - CalMTA
- Commercial Building Efficiency Accelerator - CalMTA