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Comments on Energy Code Compliance Initiatives

Thank you for the opportunity to comment on the Energy Code compliance initiatives. I appreciate the Commissionâ€™s work with local enforcement agencies, contractors, and verification providers to help the standards translate into completed projects. The September 28 presentation made clear how much implementation depends on coordination among these groups.

My name is Roshan Saxena. Iâ€™m a student in Santa Clara County, serve as a youth member of the Santa Clara County Sustainability Commission, and help lead the FUHSD Climate Collective. Iâ€™m commenting in my personal capacity.

For the Compliance Rates Study, with contractor work expected to begin in 2027, I support reporting process-based and energy-based compliance separately. It would also be helpful to identify the most common problems within each category. Missing documentation, an installation completed without a permit, and equipment that does not meet the intended performance requirements can require different responses. Some projects may have more than one issue. Understanding those differences would help agencies direct training, assistance, and enforcement toward the actual causes of noncompliance. Where feasible, published estimates should include sample sizes and uncertainty so readers understand what the findings can establish.

The presentationâ€™s discussion of residential heating and cooling replacements also points to a practical opportunity. A short homeowner checklist, built from the Commissionâ€™s existing guidance, could explain what to expect before, during, and after a replacement: permitting, contractor documentation, any required verification, and final approval. It should identify who handles each step and whom the homeowner can contact when something is unclear. Building departments, contractors, and participating incentive programs could share the same resource rather than giving households different explanations.

I also encourage translated versions and a printable option, with clear contact information for assistance. Smaller building departments and households that cannot easily navigate an online system would benefit from guidance that is straightforward to share and use.

Thank you for the continued attention to implementation. These steps could make compliance easier to understand while preserving the standards and helping deliver their intended energy savings.

Roshan Saxena