DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	273386
Document Title:	Schneider Electric Comments - Supportive Comment for Nonresidential HVAC Fault Detection and Diagnostics (Section 4012210)
Description:	N/A
Filer:	System
Organization:	Schneider Electric
Submitter Role:	Public
Submission Date:	11/5/2026 11:40:34 AM
Docketed Date:	11/5/2026

Comment Received From: Schneider Electric
Submitted On: 11/5/2026
Docket Number: 25-BSTD-03

Supportive Comment for Nonresidential HVAC Fault Detection and Diagnostics (Section 4012210)

Additional submitted attachment is included below.

Date: **November 5th, 2026**

To: **California Energy Commission**

Docket: **25-BSTD-03 (2028 Energy Code Pre-Rulemaking)**

From: **Schneider Electric**

Subject: **Supportive Comment for Nonresidential HVAC Fault Detection and Diagnostics (Section 401.2.2.10)**

Dear Commissioner McAllister and the CEC's Build Energy Efficiency Standards Team:

Schneider Electric is expressing strong support for the Nonresidential HVAC Fault Detection and Diagnostics (FDD) code proposal[1] (401.2.2.10 [New Section] HVAC FDD) for the 2028 California Energy Code (Title 24, Part 6).

Schneider Electric worked in close partnership with the Statewide CASE Team, particularly TRC, throughout the development process of the proposal. We have provided continuous technical expertise, market insights, and collaborative support to the CASE team, allowing this proposal to have the participation of a diverse energy stakeholder community.

The Nonresidential HVAC Fault Detection and Diagnostics code proposal is cost effective and represents a crucial step in meeting California's energy efficiency goals and decarbonization targets. Schneider Electric supports the anticipated rollout of the measure which includes the training and compliance enforcement necessary for its successful adoption in California.

Schneider Electric looks forward to a continued collaborative engagement on existing and future measures involving the evolution of Title 24, Part 6. Schneider Electric appreciates the work of TRC, the sponsoring utilities, and the Energy Commission staff for their support of Nonresidential HVAC FDD.

[1] Docket: 25-BSTD-03 Project Title: 2028 Energy Code Pre-Rulemaking. TN# 270774, Nonresidential HVAC Fault Detection and Diagnostics Final CASE Report

As a global specialist in energy management, Schneider Electric offers integrated solutions across multiple market segments, including utilities, infrastructure, industry, buildings, and data centers. As part of a major presence in California, we have approximately 2,600 employees at more than two dozen facilities. We also support thousands of additional direct and indirect jobs in California by working with more than 270 vendors and suppliers located throughout the state.

Schneider Electric provides an array of energy management and industrial automation solutions and services to help our customers and partners create a more digitized, efficient, resilient, and decarbonized world.

Sincerely,

Schneider Electric

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