DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	273376
Document Title:	ASHRAE Letter on Docket 25-BSTD-03, 2028 Energy Code Pre-Rulemaking
Description:	N/A
Filer:	System
Organization:	ASHRAE
Submitter Role:	Public
Submission Date:	11/5/2026 1:57:59 PM
Docketed Date:	11/5/2026

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

ASHRAE Letter on Docket 25-BSTD-03, 2028 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.

Shaping Tomorrow's Global Built Environment Today

1255 23rd Street NW, Suite 825 ▪ Tel 202.833.1830 ▪ www.ashrae.org

Sarah E. Maston, P.E.
ASHRAE Society President, 2026-2027

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November 5, 2026

David Hochschild
Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket 25-BSTD-03 – 2028 Energy Code Pre-Rulemaking

Sent via email to: docket@energy.ca.gov

Dear Chair Hochschild:

ASHRAE, founded in 1894, is a technical and professional society of more than 55,000 members, including over 3,000 in California, that focuses on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

This letter is regarding the Pre-Rulemaking Draft Regulatory Text for the 2028 California Energy Code. **We appreciate that the California Energy Code has historically referenced multiple ASHRAE standards in each successive edition of the code. We request that this draft be revised to reference the most recent editions of the following ASHRAE standards, which are listed below:**

- ASHRAE Guideline 36-2024, *High-Performance Sequences of Operation for HVAC Systems*
- ANSI/ASHRAE Standard 52.2-2025, *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size*
- ANSI/ASHRAE Standard 55-2023, *Thermal Environment Conditions for Human Occupancy*
- ANSI/ASHRAE Standard 62.1-2025, *Ventilation and Acceptable Indoor Air Quality*
- ANSI/ASHRAE Standard 62.2-2025, *Ventilation and Acceptable Indoor Air Quality in Residential Buildings*
- ANSI/ASHRAE Standard 84-2024, *Method of Testing Air-to-Air Heat/Energy Exchangers*

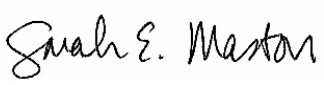
- ANSI/ASHRAE/IES Standard 90.1-2025, *Energy Standard for Sites and Buildings Except Low-Rise Residential Buildings*
- ANSI/ASHRAE Standard 193-2010 (RA 2024), *Method of Test for Determining the Airtightness of HVAC Equipment*

We also appreciate the inclusion of up-to-date references for the following ASHRAE standards in the draft:

- ANSI/ASHRAE Standard 154-2022, *Ventilation for Commercial Cooking Operations*
- ANSI/ASHRAE Standard 230-2022, *Commissioning Process for Existing Buildings and Systems*

This letter does not constitute the totality of ASHRAE's perspective on this draft rulemaking; ASHRAE may provide further comments. Thank you for your consideration of ASHRAE's comments. If you have any questions or need additional information, please feel free to contact GovAffairs@ashrae.org.

Sincerely,



Sarah E. Maston, P.E.
ASHRAE Society President, 2026-2027