

**DOCKETED**

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*Comment Received From: Karen Kristiansson  
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## **BayREN Comments on Proposed Multifamily Restructuring**

*Additional submitted attachment is included below.*



Local Governments Empowering Our Communities

October 27, 2020

California Energy Commission  
Dockets Office MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

*Submitted via Docket No. 19-BSTD-03, 2022 Energy Code Pre-Rulemaking*

**Re: Multifamily Restructuring Proposals for 2022**

Dear Commissioners and Staff,

The San Francisco Bay Area Regional Energy Network (BayREN) is pleased to submit these comments and recommendations as part of the pre-rulemaking process for the 2022 Building Energy Efficiency Standards. BayREN is a collaboration of the Association of Bay Area Governments (ABAG) and the nine Bay Area counties that draws on the expertise and proven track record of Bay Area local governments to develop and administer successful regional and local climate, energy, and sustainability programs. Our specific comments are as follows.

**Restructuring the Energy Standards for multifamily buildings to simplify enforcement will improve compliance.**

BayREN applauds the Energy Commission for undertaking this complex restructuring of multifamily energy standards. For years, energy standards for multifamily buildings have been divided between the low-rise residential subchapters and the non-residential subchapters, an approach that has been confusing to many. Energy Commission staff noted that this restructuring was taken on in order to increase uniformity and simplicity, thereby making the standards easier to use. Some changes, such as the wall U-factor unification proposals, were also made to help the energy standards work better with other Parts of Title 24.

We believe these changes will help make this section of the energy standards easier to understand and enforce, which will improve compliance and save energy. The Energy Commission needs to consider enforcement whenever updating the energy standards, and this work is a step in that direction.

BayREN has also circulated information about this effort and the proposed changes to several organizations of local government building officials and building department staff, in order to encourage direct feedback from those charged with enforcing the energy standards.

**Allowing packaging of mandatory or prescriptive measures for cost-effectiveness calculations will result in better overall outcomes.**

During the October 13 workshop, CEC staff noted that each individual improvement should pay for itself and therefore mandatory or prescriptive measures should not be "packaged" when

calculating cost-effectiveness. BayREN respectfully submits that this approach is short-sighted and could result in sub-optimal outcomes.

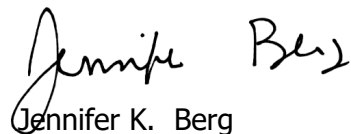
Buildings are complex systems, with considerable interaction between building elements. Certain measures, such as HVAC and envelope measures, work together to achieve the same end: a building that is heated and cooled efficiently. Having a tighter and better-insulated building envelope can reduce the heating and cooling load of the building, reducing impacts on the grid and improving building resiliency. Given this relationship, these types of mandatory or prescriptive measures should be considered together and included in the same cost-effectiveness calculation.

Achieving optimal outcomes requires looking beyond the cost-effectiveness of individual measures to determine the best overall approach. Accordingly, BayREN recommends that the CEC allow packaging of mandatory or prescriptive measures in cost-effectiveness calculations.

### **Conclusion**

We appreciate the opportunity to provide this input, and thank the CEC for its careful consideration of the BayREN's comments. We look forward to continuing to be involved in these important issues.

Respectfully Submitted,

A handwritten signature in black ink that reads "Jennifer K. Berg". The signature is written in a cursive style with a large initial "J" and "B".

Jennifer K. Berg  
Energy Programs Manager

Cc: Sara Moore, CEC-BayREN Liaison