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support for Multifamily Restructuring and All-Electric Baselines

Additional submitted attachment is included below.



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California Energy Commission

RE: 2022 Code Multifamily Streamlining and All-electric baseline

To Whom It May Concern:

The California Association of Building Energy Consultants (CABEC) is the leading association of practicing energy consultants within the state. CABEC members serve as key partners for homeowners, builders, and contractors in administration, education, and enforcement of the Energy Code. Additionally, CABEC and its members promote the broader goals of energy productivity and minimizing environmental externalities across California's world-class economy. The CABEC Advocacy¹ committee is a subgroup of CABEC members that is engaged with ongoing policy matters on behalf of our members, and we are pleased with this opportunity to comment on these proceedings. We are writing this letter to advocate for the improvements recommended by the Codes and Standards Enhancement program for Multifamily Restructuring and the Multifamily All-Electric Compliance Pathway.

The CABEC Advocacy Committee supports Multifamily Restructuring

In its current manifestation, Multifamily Energy Code is broken-- bifurcated between three and four habitable stories-- and scattered among various chapters and subchapters of the Energy Standards and referenced documents. The code structure for multifamily buildings is no longer apt for our time and is begging for restructuring and streamlining. In the context of California's housing shortage, low-rise, mid-rise, and high-rise multifamily buildings function as important building types, and yet the energy code imposes seemingly arbitrary distinctions in efficiency requirements between the low-rise and high-rise categories (as there is no mid-rise definition). This flawed ontology is carried through to separate mandatory and prescriptive requirements, and further into distinct compliance software physics engines, rulesets, compliance forms, and 3rd-party verification accreditation. All of these differences result in a further widening in compliance paths and outcomes for multifamily buildings².

Looking at any downtown, it is intuitive that there should be some divergence of requirements and baselines when one compares a 4-unit garden style low-rise building to a 300 unit, 20-story tower. But it's clear that the number of habitable stories is a poor criterion for that divergence. The CASE report on Multifamily Restructuring presents a much more appropriate

¹ Members of the Advocacy committee that are formally engaged with the CASE initiative have recused themselves and were not involved in the authorship of this letter.

²For example: Comparing requirements between a 3-story multifamily building and a nearly identical adjacent 4-story multifamily building, the 4-story multifamily building allows for ~50% less efficient glazed doors and operable windows in the prescriptive requirements.

set of criteria for establishing prescriptive requirements and baselines. CABEC supports the restructuring of multifamily energy code around type of construction and mechanical equipment instead of the current arbitrary distinction by the number of habitable stories.

The benefits of this restructuring will have immediate beneficial impact and a long tail. Restructuring Multifamily Energy Code will:

- *Bring needed clarity and human-readability to multifamily energy code. The current code is confusingly structured and laid out and is therefore poorly comprehended by many. Restructuring will improve understanding, interpretation, and access specific to the Multifamily energy code, and therefore improve the process of meeting compliance for all stakeholders.*
- *Bring equity in energy efficiency across multifamily building types, instead of the arbitrary schism currently defined by the number of stories.*
- *Create a new platform that will reap downstream benefits in future code cycles with further clarity, simplicity, alignment and implementation to the multifamily sector, which is an essential sector to meeting California's housing needs. In particular, restructuring will better allow for improvements to compliance documentation³, HERS registration, and HERS verifications on multifamily projects.*

The CABEC Advocacy Committee supports Building Electrification

We would like to join the chorus of voices advocating for further development of All-electric options and baselines in the 2022 code cycle (and beyond). Given the policy targets and goals that are mandated through legislation and executive orders, it is readily apparent that fossil fuel consumption must be dramatically reduced in our building stock. We support ongoing and continued efforts to remove barriers to all-electric buildings through the creation of all-electric baselines for all building types. Furthermore, we support 'tightening' the fossil fuel baselines through the deployment of Time Dependent Source and similar metrics. Every new gas line installed is likely a future stranded asset, a future financial liability to building owners, ratepayers, and citizens, and a stumbling block to meeting our greenhouse gas emissions targets. We support policies which allow us as Title 24 energy consultants to evaluate the expanding set of cost-effective electricity-based options for all regulated loads in the course of our compliance work, and help transform a market where all-electric buildings are perceived as exceptional to one where it is a norm.

Sincerely,



Lucas Morton, on behalf of the
CABEC Advocacy Committee

³ Anecdotally-- some current Multifamily projects require hundreds of pages of compliance forms.