

DOCKETED

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Comments on 45-day language

Additional submitted attachment is included below.



Local Governments Empowering Our Communities

June 21, 2021

California Energy Commission

Dockets Office MS-4

1516 Ninth Street

Sacramento, CA 95814-5512

Submitted via Docket No. 21-BSTD-01, 2022 Energy Code Update Rulemaking

Re: Comments on 2022 Energy Code Update, 45-day Language

Dear Commissioners and Staff,

The San Francisco Bay Area Regional Energy Network (BayREN) Codes and Standards Program 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. BayREN's Codes and Standards Program works to save energy by improving compliance with the Title 24 Parts 6 and 11, and by supporting and encouraging local energy policies such as reach codes. We work closely with local government staff from building departments and sustainability offices in particular.

In general, we commend and thank the Commission and staff for all the hard work that has gone into the 2022 Energy Code Update. The proposed Code Update would increase energy efficiency and reduce greenhouse gas emissions from buildings, which are essential for meeting not only California's goals but also the goals of many local governments. Our specific comments on elements of the Code Update are as follows.

Support for new multi-family chapter and restructuring.

BayREN Codes and Standards would like to thank CEC staff for restructuring the multifamily energy standards. These changes make the energy standards easier to understand and enforce, thereby improving compliance and energy savings.

Recommendation to continue providing an Index

To further make the Energy Code easier to understand and enforce, the final version of the 2022 Energy Code Update should include an Index, similar to other Parts of Title 24. The 2019 Energy Code Update was the first time that an index was provided. Since local government staff work with all of the Parts, anything that makes Part 6 more like the other Parts and easier to navigate, such as an Index, will help local staff with enforcement of the Energy Code.

Support for heat pump baselines, heat pump requirements, and electric-ready requirements.

Over a third of local jurisdictions in the San Francisco Bay Area have adopted reach codes that either require or encourage efficient all-electric construction, and more jurisdictions within our territory are considering similar reach codes. In addition, local governments are starting to consider reach codes for existing buildings more than ever before. The inclusion of heat pump baselines, requirements for heat pumps either for water heating or space heating, and electric-ready requirements in the 2022 Energy Code Update build on and support these local efforts.

Recommendation for expanded compliance incentives, enhanced compliance software, and 2022 Compliance Manuals to address heat pump systems for large buildings

While heat pump technologies for smaller buildings have been incorporated into the Energy Code, heat pump systems for larger buildings are lagging. These systems are an important piece of the puzzle for local governments looking at ways to reduce both energy use and greenhouse gas emissions from buildings. The Energy Code and the software that supports it therefore need to include compliance incentives and the ability to model these types of systems. In addition, the 2022 Compliance Manuals should include appropriate detail and guidance to help building professionals and building departments navigate compliance issues for these systems.

Recommendation for encouraging or requiring Certified Energy Analysts (CEAs) to complete energy models and compliance forms for new residential and nonresidential projects

As the Energy Code and building systems both grow increasingly complex, navigating energy models and producing compliance forms that are accurate and appropriate becomes more difficult. Feedback from local government staff indicates that the additional training and testing required for CEAs tends to lead to more accurate analyses as well as system definitions that are better based in reality and consistent with plans. Some local reach codes already recognize the value provided by CEAs by either reducing the Energy Design Rating increase required for a new building if the documentation is prepared and signed by a CEA, or simply requiring the use of CEAs. The Commission should therefore consider encouraging or requiring the use of CEAs statewide through the Energy Code.

Conclusion

Thank you for the opportunity to provide this input, and for your careful consideration of these comments. We look forward to continuing to be involved in these important issues.

Respectfully submitted,



Karen Kristiansson
BayREN Codes & Standards Program Manager

Cc: Judy Roberson, CEC-BayREN Liaison