

DOCKETED

Docket Number:	21-BSTD-03
Project Title:	2022 Rulemaking for Part 11 (CalGreen) and Parts 2-5 of the Building Standards Code
TN #:	240690
Document Title:	Public Comments and Responses to the Proposed Revisions to 2022 Title 24 Part 11, and Parts 2 Through 5
Description:	Collected public comments and responses to the 2022 proposed revisions to Title 24, Part 11 (CalGreen), and Parts 2-5 of the Building Standards Code.
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Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Comment Numbers	Commenter and/or Copy of Comment Language (mainly for Legal Office Use, will be removed from final submission)	Summary of the Comment	The Commission's Response to the Comment	Title or Other Description of Comment (link to docketed comment if possible)
239024.001	Daniel Chandler	Commenter requests that in addition to electrification measures, code should ban natural gas installations in new construction.	Staff considered the commenter's suggestion regarding a GHG-based prohibition on natural gas and chose not to accept the suggestion because it was outside the scope of this rulemaking.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239024&DocumentContentId=72457
239024.002	Daniel Chandler	Commenter recommends that CALGreen be a mandatory, not a voluntary code.	The purpose of the Voluntary Appendices in CALGreen is to provide a template for local jurisdictions that want to exceed the Energy Code. All mandatory energy provisions are in Title 24, Part 6, the California Energy Code.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239024&DocumentContentId=72457
239124.001	Cathy Chandler-Klein	Commenter recommends statewide electric ready new construction with no gas infrastructure.	Staff considered the commenter's suggestion regarding a GHG-based prohibition on natural gas and chose not to accept the suggestion because it was outside the scope of this rulemaking.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239124&DocumentContentId=72575
239124.002	Cathy Chandler-Klein	Commenter recommends no additional utility fees for rooftop solar.	Thank you for your comment. The California Energy Commission does not have the authority to recommend or set utility rates.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239124&DocumentContentId=72575
239169.000	David Bezanson	Commenter is providing information to support our path to decarbonization by showing the issues with Natural Gas and Hydrogen. Mainly cost issues.	Staff appreciates the comment supporting the proposed amendment.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239169&DocumentContentId=72624
239178.001	Stone Energy Associates	This comment pertains to multifamily code language in the Part 6 Energy Code. The commenter has submitted this comment to the appropriate docket for Part 6 Energy Code, Docket#21-BSTD-01.	Staff responded to Stone Energy Associates comment by recommending that it be addressed to 21-BSTD-01, the Part 6 Energy Code.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239178&DocumentContentId=72628
239218.000	American Institute of Architects California	This commenter recommends establishment of a standing committee or commission, working with the responsible agencies, to oversee an integrated and updated revision of CALGreen to include emerging best practices and forward-looking design parameters for future buildings.	Thank you for your comment, staff is committed to working with stakeholders on this issue. While it is outside the California Energy Commission's authority to convene the recommended standing committee, staff recognizes the value of CALGreen as a template for exemplary best practices and is ready to work with sister agencies and stakeholders toward this goal.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239218&DocumentContentId=72670
239237.000	Mountain Electric Company	This commenter recommends that the CEC require local Authorities Having Jurisdiction report all purchased HVAC units in order to stop unpermitted installations, and notes that less than 10% of HVAC change-outs in California are permitted.	Staff acknowledges this comment, but this proposal was not part of the scope for this rulemaking, so no change was made in response to this comment. Staff also notes that the California Energy Commission is committed to working with local Authorities Having Jurisdiction in order to meet state and local energy efficiency goals.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239237&DocumentContentId=72684
239303.000	Statewide Utility Codes and Standards Enhancement Team	The Codes and Standards Enhancement (CASE) Initiative presents a comprehensive code change proposal for Voluntary Energy Efficiency Requirements for Title 24, Part 11 (CALGreen)	Staff as always thank the CASE team for their thorough analytical work. Staff have incorporated elements of this proposal for the 2022 code cycle where possible where appropriate, and will consider the remainder in the upcoming 2025 code cycle updates to CALGreen.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239303&DocumentContentId=72759

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239321.001	North American Insulation Manufacturers Association	Commenter claims it is unclear how the Values in Table A4.203.1.1 were developed	During the August 6th Commissioner hearing Staff presented how the Values of Table A.4.203.1.1 were derived and also more information can be found in Document relied upon Docket numbers 238642 and 238641	https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-BSTD-03
239321.002	North American Insulation Manufacturers Association	Commenter requests to apply a two measure prerequisite for compliance with CALGreen	With in the 15-day language staff did update the prerequisite option Title 24, Part 11 to two of the listed efficiency measures as specified in Sections A4.203.1.2.1 through A4.203.1.2.8	https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-BSTD-03
239321.003	North American Insulation Manufacturers Association	Commenter requests an explanation on what percent energy savings CALGreen goes beyond the base code	This information can be found in the CASE report Docketed Docket number 238641	https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-BSTD-03
239321.004	North American Insulation Manufacturers Association	Commenter requests to add buried ducts as a High-performance prerequisite option.	To meet the EDR 1 Compliance margin one can use the compliance software and model the buried duct and will receive a compliance marge credit.	https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-BSTD-03
239333.000	Dan Johnson, CEA	Commenter asks to know if the Energy Code ventilation requirements supercede the requirements in the California Mechanical Code	Staff amended the language in Chapter 4, Section 402.1 to clarify the relationship between the Energy Code and the Mechanical Code, consistent with the commenter's request.	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239333&DocumentContentId=72789
Comments during the Sept 30 Business Meeting	Igor Tregub, Chair of the California Democratic Party, but speaking as an individual	Support the approach proposed by staff	Staff appreciates the comment supporting the proposed amendment.	
Comments during the Sept 30 Business Meeting	Kiki Velez, Natural Resources Defense Council	Support Part 11 including the amendments proposed today	Staff appreciates the comment supporting the proposed amendment.	
Comments during the Sept 30 Business Meeting	Braxton Bridgers, Association for Energy Affordability, AEA	Supporting building decarbonization efforts across the state	Staff appreciates the comment supporting the proposed amendment.	
Comments during the Sept 30 Business Meeting	Lauren Cullum, Sierra Club California	We support the CEC's proposal and recommendation to adopt the amendments to the CALGreen code	Staff appreciates the comment supporting the proposed amendment.	
Comments during the Sept 30 Business Meeting	Kevin Ma, Silicon Valley Youth Climate Action	Strongly support the major improvement to the heat pump baseline in this Part 11 Title 24	Staff appreciates the comment supporting the proposed amendment.	