

DOCKETED

Docket Number:	22-BSTD-01
Project Title:	2025 Energy Code Pre-Rulemaking
TN #:	242438
Document Title:	taylor engineers Comments - Centralized Permit Review Office
Description:	N/A
Filer:	System
Organization:	taylor engineers
Submitter Role:	Public
Submission Date:	3/23/2022 5:40:28 PM
Docketed Date:	3/24/2022

Comment Received From: taylor engineers
Submitted On: 3/23/2022
Docket Number: 22-BSTD-01

Centralized Permit Review Office

After attending the 2025 Energy Code Compliance Tools Staff Workshop yesterday, I am more convinced than ever that Title 24 compliance and enforcement are poor and that the best way to improve compliance is with a centralized permit review office. Please see the attached description of such an office.

Additional submitted attachment is included below.

Title 24 Proposal: Centralized Energy Code Compliance Reviews

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March 23, 2022

Problem: There is a significant performance gap between Title 24 and actual buildings. This gap impedes the building industry's ability to help meet California's statutory requirements to reduce greenhouse gas emissions.

- The energy code is continually changing and increasingly complicated. It is difficult for designers and other key industry stakeholders to keep up with Title 24 requirements.
- Many mandatory and prescriptive requirements are not met in permitted designs and constructed building.
- Taylor Engineers peer reviews dozens of designs every year. Almost all of them include serious energy code violations; many of which are for requirements that have been in the code for many update cycles. Common code violations include:
 - Failure to implement Isolation Areas (120.2(g))
 - Single Max VAV logic instead of Dual Max (140.4(d)2)
 - Fixed duct static pressure setpoint instead of setpoint reset (140.4(c)2.B)
 - Supply air temperature setpoint reset by outside air temperature rather than zone demand (140.4(f))
 - Failure to use available transfer air for kitchen or lab exhaust makeup (140.4(o))
 - CBECC-Com models that bear little resemblance to the actual design
- The authorities having jurisdiction (AHJs) for Title 24 do not catch compliance issues.
 - From our experience, AHJ enforcement generally only confirms that Title 24 forms are on the drawings. There is little or no confirmation that the content in forms accurately represents the building or that the building meets code. Permits may be denied for not having the forms but rarely for real Title 24 violations.
 - The performance approach via CBECC-Com is flawed. The software is limited in capability and allows for simulations with excessive unmet loads to comply. Professional modelers routinely make egregious designs comply either by modeling something that does not accurately represent the design or by circumventing software limitations to generate a "Complies" result.
 - It takes training, expertise, and motivation to enforce Title 24. That is asking too much of building inspectors who cannot be experts in everything and whose focus is generally on safety issues.
- The Compliance Forms that are intended to improve compliance and verification are impractical or ambiguous in many cases, easy to simply fake, and subject to the same lack of review by AHJs as with permit applications. For example, one of the forms requires visual inspection of duct connections and seals for essentially an entire duct system, much of which may not be accessible.
- Continued improvements to Title 24 will have limited real impact on actual building performance given the current industry situation.

Proposed Solution: Centralized Title 24 permit reviews

- A dedicated organization, let's call it the Title 24 Permit Review Office (T24-PROs), that reviews building permit applications for Title 24 compliance on behalf of AHJs, and sponsored by the CEC, CPUC, or IOUs. Staffed by trained and motivated experts.
- AHJs would outsource the energy reviews to the T24-PROs, but would maintain legal authority. This "do no harm" approach eliminates the risk that T24-PROs becomes a bottleneck, like some other state bureaucracies.
- Initially T24-PROs would have a small staff and would only review a small fraction of the permits statewide, perhaps by AHJ request. AHJs would remain responsible for reviews not performed by T24-PROs. The T24-PROs could also selectively audit reviews performed by AHJs to demonstrate the value of a T24-PROs review. As T24-PROs demonstrate its value its budget and staff will grow, allowing it to review more statewide permit applications, and eventually all of them.
- Some of the benefits with this approach:
 - Centralizing the review process to a small group of trained, motivated experts would improve review quality, consistency, and thoroughness, i.e. REAL ENERGY SAVINGS!
 - Economy of scale – experts whose sole focus is energy compliance will have the experience and processes in place to review Title 24 permits more efficiently than jack-of-all trades AHJs.
 - Centralizing reviews would help better understand which requirements are most frequently not met.
 - Better understanding of common issues would allow for focusing future reviews and reviewer training.
 - Better understanding of common issues would help prioritize topics for industry education and outreach.
 - Reduce and eventually eliminate the need to train AHJs on Title 24 enforcement, allowing them to focus on other non-energy compliance issues.
 - Reduce the paperwork burden of acceptance forms. The trained reviewers would comb through actual plans, specifications, and energy models to verify true compliance, rather than simply checking off that forms were submitted.