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CodeCycleorg Comments on RECI FOA

Additional submitted attachment is included below.

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October 24, 2022

Dear California Energy Commission,

CodeCylce.org is excited to hear about the State's ongoing efforts to both simplify the Title 24 implementation process and improve statewide compliance outcomes. Federal funding through the Infrastructure Investment and Jobs Act (IIJA) for innovative code implementation solutions reflects a national need to rethink and rapidly advance the means by which building energy efficiency standards are managed.

CodeCycle.org would particularly like to commend the Energy Commission for focusing on AHJ assistance and AHJ partnerships through the Resilient and Efficient Codes Implementation (RECI) funding opportunity. AHJ's have obviously been a core constituent to the State's Title 24 compliance improvement efforts, but traditional analog means of compliance assessment (e.g. analog forms) present a challenge for time constrained building departments. Digitized enforcement tools can assist all stakeholders in the compliance process, but the streamlining permitted by a digital compliance ecosystem is likely to show the greatest benefit for local building departments.

Partnership opportunities:

As the Energy Commission reviews potential partnerships for a grant submission in response to the RECI FOA, CodeCycle.org would like to offer its services as a potential project partner. CodeCycle.org has been iterating on digital means to improve both the accuracy and transparency of Title 24 enforcement processes for a number of years. A focus of CodeCycle.org's work has been on field demonstrations with AHJs interested in deploying new compliance solutions. Those AHJ partnerships have been supported by both BayREN's Codes & Standards program and the CEC funded CalSEED program. One such AHJ partnership has continued for 7 years now.

Improving California's Title 24 implementation systems will deliver benefits to California far beyond the immediate energy savings that result from increased compliance. Better enforcement of efficiency standards will increase demand for a well-trained workforce. Streamlined code enforcement mechanisms should also help to level the playing field for Title 24 implementation across jurisdictions by

supplanting the need to hire additional enforcement staff to address the historic burden created by the energy code's overwhelming complexity.

The RECI FOA is timely opportunity for the Energy Commission and for AHJs throughout California. CodeCycle.org is here to assist the Commission in whatever capacity you find helpful.

Best,



Tom Garcia
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