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*Comment Received From: Meg Waltner
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**NRDC Comments on CEH, Guideline 36, and Refrigeration
Workshop**

Additional submitted attachment is included below.

August 18, 2023

California Energy Commission
Re: Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Dear Commissioners and CEC Staff,

The Natural Resources Defense Council (NRDC) submits the following comments on behalf of its more than 450,000 members and activists in California who are advocating for affordable and equitable decarbonization and clean air policies to help mitigate the climate crisis and advance a sustainable economy. These comments are in response to the California Energy Commission's (CEC) August 10, 2023 workshop for the 2025 Title 24 proposed requirements for controlled environment horticulture, refrigeration systems, and nonresidential HVAC controls. NRDC supports the measures proposed in the workshop and offers the following detailed comments.

NRDC strongly supports the proposed measures for controlled environment horticulture which would require a minimum lighting efficacy of 2.3 $\mu\text{mol}/\text{J}$ for both indoor growing facilities and greenhouses. This proposed level will effectively require the use of LED lights and eliminate the use of less efficient high pressure sodium and ceramic metal halide lamps. LED grow lights are widely available in a broad range of spectra and are a technically feasible lighting technology for these facilities that will result in cost-effective savings for Californians. The energy savings from this proposed measure are very significant: the CASE team estimates that this measure will save 112 GWh of electricity and 7,845 Metric Tons of CO₂ emissions in the first year, equivalent to the annual electricity use of 11,600 California residences. We urge the CEC to finalize the proposed requirements for CEH lighting efficacy as proposed in the workshop.

NRDC also strongly supports the proposed requirements for nonresidential HVAC controls which would require the use of ASHRAE Guideline 36 control sequences for new and replacement HVAC systems. This measure would result in significant energy savings – an estimated 44.5 GWh per year – by improving the control sequences that govern how HVAC systems operate and therefore how much energy they use by ensuring that high performance control strategies are implemented. The proposed measure will also improve HVAC system performance after the building is occupied through on-going fault detection and diagnostics. Finally, the proposed requirements would streamline the delivery of HVAC controls systems through the use of the CEC-certified Guideline 36 programming library, reducing the burden on the design industry.

In summary, NRDC supports all three measures proposed in the August 10th workshop which will result in important energy savings, reducing demand and emissions throughout the state. We

urge the CEC to incorporate the proposals into the Title 24 Part 6 Express Terms that it expects to publish this fall.

We appreciate the opportunity to comment and welcome any further discussion on these measures.

Sincerely,

Merrian Borgeson
California Director, Climate & Clean Energy
Natural Resources Defense Council (NRDC)

Meg Waltner
Project Manager
Energy 350, on behalf of NRDC