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Tri-County Regional Energy Network Comments

Additional submitted attachment is included below.



August 30, 2023
California Energy Commission
Re: Docket No. 22-BSTD-01
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Dear Commissioners and Staff,

The Tri-County Regional Energy Network (3C-REN) is pleased to submit these comments and recommendations as part of the rulemaking process for the 2025 Building Energy Efficiency Standards to the California Energy Commission (CEC). The Tri-County Regional Energy Network (3C-REN) is a collaboration among three California Central Coast counties (San Luis Obispo, Santa Barbara and Ventura) established to deliver energy-saving programs and industry trainings that help reduce energy use, strengthen local job markets, and support efforts to achieve climate goals. 3C-REN's locally managed energy-saving programs and services are designed to address existing gaps in current programs, and to meet the needs of local government agencies, building professionals, and residents throughout the region. 3C-REN also strives to leverage our programs as a way to re-invest in our community as a whole, support historically underserved communities, and mitigate gaps and disparities caused by social inequality.

After several years' experience and cooperative administration of energy and sustainability programs, the three counties formed the 3C-REN, led by the County of Ventura, to better leverage resources in the delivery of effective programs on a regional level. One of those programs is Energy Code Connect which provides building professionals with forums, trainings, and support services focused on increasing comprehension, compliance, and enforcement of California's energy code. With the needs of the local building industry in mind, 3C-REN offers the following comments to changes proposed under the 2025 Codes and Standards Enhancement (CASE) initiative:



3C-REN supports the proposed code change lowering the window U-factor in single family homes for new construction and alterations.

3C-REN supports the proposal to change both mandatory rules and the prescriptive pathway for window U-factors in single family homes. 3C-REN supports the mandatory requirement being lowered from 0.45 to 0.4. The prescriptive pathway changes would apply for some 3C-REN territories [climates zones(CZ) of 4, 5, 6, 9 and 13] – excepting that in CZ09—and thus supports new construction U-factor being lowered to 0.27 in CZs 1-5, 11-14, and 16 for new construction. CZ 9 will remain at 0.30. Finally, 3C-REN supports changing the U-factor for alterations to 0.27 across all CZs. In general, these measures should prove cost effective and help with 3C-REN’s goals of improving energy efficiency, lowering customer bills especially for underserved populations, and reducing greenhouse gas emissions (GHGs).

3C-REN supports changing the maximum U-factor for framed walls in single family homes.

The proposed change would lower the maximum U-factor of a 2x4 wood framed wall to 0.095, and a maximum U-factor of 0.069 for wood framed walls 2x6 or greater. This mandatory requirement will raise the bar for overall building envelope performance with minimum incremental cost. 3C-REN understands that a similar proposal was made in previous code cycles as a prescriptive measure but was not implemented due to its cost effectiveness. We appreciate that the team addressed this issue in the current code cycle by making the mandatory requirement not as stringent as stated in previous attempts. This will improve the benefit to cost ratio for projects in our communities.

3C-REN supports the code updates around buried ducts for single family homes.

As the goal of the buried duct changes is to reduce barriers and improve the performance pathway without any prescriptive changes, 3C-REN supports the proposed changes. Improvements to the compliance manual and software better illustrating the benefits of buried ducts will positively impact all 3C-REN territories when customers consider using buried ducts to increase their energy efficiency.

3C-REN supports the proposed code changes to allow projects more compliance flexibility for single family new construction and additions of cathedral ceilings.

The proposed measure would not impact field verification (i.e., no new training for building professionals) and does not modify the existing energy budget, so 3C-REN supports the



proposed code changes of moving the base case (existing prescriptive option B) to R-38 cavity insulation across all CZs. This updated pathway is intended to achieve compliance with the energy savings currently required by the standard design (i.e., reach an equivalent performance with the other prescriptive options) and will see similar energy savings as other methods across the CZs, other than CZ 8, which does not apply to 3C-REN territory.

3C-REN has concerns about proposed changes related to multifamily indoor air quality.

3C-REN has multiple concerns about the proposed changes to multifamily indoor air quality code requirements. The prescriptive HRV requirement being proposed is not cost-effective for three of 3C-REN territories CZs: CZ05, CZ06 and CZ09. This puts a concerning burden on the low-income and other disadvantaged communities that 3C-REN is dedicated to supporting. While mandatory measures are not required to be cost-effective, 3C-REN would encourage the commission to consider cost implications for low-income and disadvantaged residents. 3C-REN would also like further clarification on assumptions regarding baseline ventilation conditions in the market in terms of the breakdown between multifamily buildings and their ventilation approaches. This will have an impact on cost effectiveness that cannot correctly be evaluated without revisiting and verifying the numbers in this assumption.

3C-REN supports the proposed restructuring to multifamily building code but has concerns.

3C-REN supports the suggestions to ease the navigability of the multifamily code but has concerns over some of the suggested content changes. Changes to the language, such as now making codes and HERS verification applicable to all multifamily buildings (instead of low-rise only or high-rise only) may present educational challenges to building staff and the construction industry, but 3C-REN can assist with this through both its codes and standards support program and its workforce training and education program. There are, however, concerns around the central ventilation shaft sealing requirement being not as cost effective in one of 3C-REN's CZs – CZ 6, and 3C-REN would like CEC staff to consider if any exception or alternative is available to serve the needs of low-income residents in 3C-REN territory.

3C-REN supports code changes for multifamily building roofs and windows for new buildings but is concerned about the feasibility for alterations.

The proposed code changes for roofs and windows are expected to be cost effective for climate zones within 3C-REN territory, allowing more climate zones for cool roofs with a low-sloped roofs with Option D, likely leading to better performing new multifamily buildings, which aligns



with 3C-REN's goals for energy and GHG savings in all new buildings. However, this will make it harder for existing buildings to meet the requirements for mandatory insulation levels. The proposed U-factor changes for all other fenestration that is new construction is 0.28 in CZs 1, 3-5, 11, and 13-16; for alterations U= 0.28 in CZs 1, 3, 5, and 16, which affects some 3C-REN territory. These have all shown to be cost effective in 3C-REN territory and 3C-REN thus supports these measures to help reduce customers' energy bills, source consumption, and GHG emissions.

To summarize, 3C-REN supports most of the single-family residential code updates suggested in the August 17, 2023, stakeholder session. 3C-REN finds that most of the multifamily residential code suggestions align with its goal of reducing GHG emissions; however, concerns remain about the cost effectiveness and feasibility of a few of the proposed measures. 3C-REN appreciates the opportunity to provide this feedback and be part of the stakeholder process.

Sincerely,

Jordan Garbayo

Energy Program Manager, Tri County Regional Energy Network