

**DOCKETED**

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*Comment Received From: Jordan Garbayo  
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## **Tri-County Regional Energy Network Comments**

*Additional submitted attachment is included below.*



Sept 5, 2023

California Energy Commission

Re: Docket No. 22-BSTD-01

1516 Ninth Street

Sacramento, CA 95814

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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. Each county was experienced with local energy and sustainability programs, and they came together to form an organization that could support the counties at a regional level. 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's programs are intended to reinvest in the community, and a diverse group of underserved and hard to reach communities are a priority for 3C-REN, both as part of the workforce and as consumers.

Reaching both the public and private sector, 3C-REN's Energy Code Connect program provides building professionals with forums, trainings, and support services with the aim of increasing comprehension, compliance, and enforcement of California's energy code. Based on the knowledge 3C-REN has gained working with these professionals, it offers the following comments to changes proposed under the 2025 Codes and Standards Enhancement (CASE) initiative:



3C-REN supports most multifamily domestic hot water system proposed changes with two concerns.

Many of the proposed changes to multifamily domestic hot water system codes are shown to be cost effective across all climate zones (CZ), leading to 3C-REN's support. This is true of the plumbing code update, pipe insulation element, thermostatic balancing valves (especially since this measure is a compliance pathway, not a prescribed measure), master mixing valves, individual HPWH ventilation, and building level electric ready measures. 3C-REN can assist with education and training for individual HPWH ventilation methods to ensure the cost effectiveness benefits can be felt for all communities in its territories. For the central HPWH clean-up, 3C-REN is concerned that these proposed changes are not cost effective across all building prototypes or climate zones, and thus desires further consideration of cost effectiveness before any future mandatory requirements. Finally, for the electric readiness of central domestic hot water systems, 3C-REN would like to note that these measures are only cost-effective if HPWHs are eventually installed, and thus would like to see further support for HPWH retrofits to go along with this measure.

3C-REN supports the proposed changes for residential HVAC performance subcategories but desires further research into how single-family small homes may benefit from HVAC design changes and how multifamily buildings and single-family small homes can benefit from refrigerant charge verification savings.

Overall, 3C-REN supports the proposed changes for residential HVAC performance measures. For HVAC system design, 3C-REN territories fall within climate zones where the changes would be cost effective for most single-family homes and alterations. 3C-REN would support further research into how to make HVAC design changes that provide energy and cost savings and improved comfort to those in small single-family homes but agrees that at this time no requirements should be made as they are not cost effective. The same applies for new supplemental heating measures. For the defrost function, 3C-REN does include climate zones in its territories which do not have any applicable savings; however, the savings and cost effectiveness for the rest of the climate zones is acceptable and thus 3C-REN supports these measures. Crankcase heating changes show varying but overall positive savings across climate zones, but as the potential cost savings are high for some regions, 3C-REN supports these updates. 3C-REN recommends further research into refrigerant charge verifications to consider ways that multifamily buildings and small homes may benefit from energy savings. At present, 3C-REN supports the proposed changes being implemented in the selected cost-effective climate zones. Finally, 3C-REN supports the proposed updates in the compliance software for



variable capacity systems and acknowledges that while other updates will not result in any energy savings, they may bring other benefits to residents.

3C-REN supports proposed code changes for cooling towers.

3C-REN supports the proposed code changes for cooling towers, as they provide water and energy savings in all CZ in 3C-REN's territory, except for CZ16, where the changes would not apply.

3C-REN supports the proposed changes to process load pipe insulation for multifamily homes.

Due to the cost effectiveness and cost benefit ratio across climate zones, 3C-REN supports the proposed changes to process load pipe insulation for multifamily homes. Updating existing buildings will provide significant cost savings, while new buildings and additions can have greater energy efficiency from the start.

3C-REN supports the proposed changes for pools and spas.

3C-REN territory multifamily pools and spas should receive significant savings energy savings by utilizing covers, solar thermal, and switching to an electric heat pump water heater with a gas backup, and so 3C-REN supports the proposed changes for pools and spas.

To summarize, 3C-REN broadly supports all measures introduced in the August 23 workshop, with only a few concerns noted above to ensure that energy saving benefits are equitable across Climate zones and population categories. 3C-REN looks forward to informing the tri-county region of these and other changes once the energy code is adopted.

Sincerely,

Jordan Garbayo

Energy Program Manager, Tri County Regional Energy Network