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ASHRAE Letter - 22-BSTD-01 2025 Update to California Energy Code

Additional submitted attachment is included below.

180 Technology Parkway, NW • Peachtree Corners, GA 30092-2977 • Tel: 404.636.8400 • Fax: 404.321.5478

Ginger Scoggins
2023-2024 ASHRAE President

Engineered Designs, Inc.
1151 SE Cary Pkwy., Ste. 200
Cary, NC 27518
Phone: (919) 851-8481
Email: gscoggins@engineereddesigns.com

November 17, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 22-BSTD-01
715 P Street
Sacramento, California 95814

Sent via email to: docket@energy.ca.gov

RE: Docket 22-BSTD-01: 2025 Update to California Energy Code

Dear Chair Hochschild and Commission Members:

Thank you for the opportunity to comment on Docket 22-BSTD-01, California's proposed 2025 Building Energy Efficiency Standards.

ASHRAE is a technical and professional society with a mission to serve humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields. Our more than 51,000 members include over 3,000 members in California. Since 1894, ASHRAE has been involved in improving technology for the built environment, including through research, voluntary consensus-based standards development, training/education and certification.

ANSI/ASHRAE/IES Standard 90.1, *Energy Standard for Buildings Except Low-Rise Residential Buildings*, is the benchmark for commercial building energy codes in the United States and has been a key basis for codes and standards around the world for more than 45 years. It is an indispensable reference for engineers and other professionals involved in design of buildings and building systems. The latest edition of Standard 90.1, the 2022 edition, includes significant updates and clarifications to previous editions. The 2022 edition is the first minimum-efficiency U.S. model energy standard or code with an expanded scope that includes not only buildings, but the entire building site, including renewable energy located on-site. It is estimated to reduce energy costs by over 15% compared to the 2019 version, and over 48% compared to the 2004 version. Although the Department of Energy has not yet issued a positive determination that the 2022 edition of Standard 90.1 will achieve greater energy efficiency in buildings subject to the code, we expect an affirmative statement, as has been issued for all previous editions of the standard. ASHRAE suggests that the proposed 2025 code update be amended to refer to the 2022 edition of 90.1, rather than the 2019 edition.

Several other ASHRAE standards are also referenced in the draft Building Energy Efficiency Standards, including the 2019 editions of Standards 62.1, *Ventilation for Acceptable Indoor Air Quality*, and Standard 62.2, *Ventilation for Acceptable Indoor Air Quality in Residential Buildings*. The latest editions of both Standard 62.1 and 62.2 were issued in 2022. These current editions include important updates to the procedures and methods for meeting minimum ventilation and indoor air quality (IAQ) requirements. We suggest that the references to the 2019 editions be amended to refer to the 2022 editions.

Again, we appreciate the inclusion of multiple ASHRAE standards in the proposed code update, and suggest amending the text to reference the latest editions of Standards 62.1, 62.2 and 90.1. We would be happy to answer any questions you have or provide technical assistance as you advance California's building standards. Thank you for your consideration of ASHRAE's comments.

Sincerely,

Ginger Scoggins
ASHRAE President 2023-2024