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CBIA Comments on Part 6 - Peak Cooling Energy Calculation - SUPPORT

Additional submitted attachment is included below.

May 3, 2024

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: **Docket No. 24-BSTD-01**
2025 Update to the Building Energy Efficiency Standards
Peak Cooling Energy Calculation
Comments by: **California Building Industry Association**

Dear Commissioner McAllister

Introduction

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member companies involved in residential and light commercial construction. CBIA member companies are responsible for over 85% of the new single-family homes built in California annually.

Background

For the 2025 Residential Building Energy Efficiency Standards (BEES), the CEC is moving away from the Time Dependent Valuation (TDV) metric, which emphasizes summer peak load reduction measures, and will instead use the "Long-term System Cost" (LSC) metric, which focuses more on preparation for the long-term impacts of climate change and the impact of electrification policy measures on the grid. While this is a well-intentioned response to the climate crisis, some unintended short-term issues have emerged.

The Problem

Including the LSC as a metric in the 2025 Residential BEES has resulted in an analysis showing two new peak loads emerging in the winter months, now exceeding the already huge peak load in the summer months. Specifically, the current (and very large) summer HVAC peak is now in third place behind the projected #2 peak load that will occur at midnight during the winter months. The analysis also shows that the new, largest peak load will occur at 8 p.m. **during the winter months** and is estimated to be **twice the size** of the existing summer peak load. This stunning change in peak load projections is primarily due to the assumed power demand from the massive, statewide application of heat pump space heating and EV charging during the evening hours.

CBIA is not taking issue with this projected impact of electrification on the grid in the decades to come. This may well be the case. However, if left unchanged, the impact of this new metric on the 2025 Residential BEES will effectively diminish the critically needed focus on efficiency measures that reduce the summer peak loads that are the reality of today.

CEC Staff Response

After the Pre-Rulemaking Workshops last Fall, CEC Staff collaborated with stakeholders, including CBIA and our energy consultants. From those discussions, staff determined that additional flexibility would be needed to address orientation, fenestration allocations, and various construction practices.

Most importantly, in response to the issues cited earlier, staff introduced a new proposed performance path for the peak cooling energy calculation. Specifically, new calculations for peak cooling energy in Climate Zones 4 and 8-15 that achieve **120% or less** of the peak cooling energy of the 2025 single-family prototype (used in the prescriptive path) would be used to demonstrate compliance. Staff is proposing that the specific details of this compliance path calculation be incorporated into the development and adoption of the 2025 Single-Family Residential ACM Reference Manual later this year.

Industry Support

As with other groups participating in this proceeding, CBIA supports this solution to the short-term issues associated with the change in compliance metrics.

CBIA recognizes the CEC's need to address climate change's impact on the grid in the decades to come, but this shouldn't impact the critical need to address our current summer peak load issues. Reducing the summer peak loads is good for the grid and especially good for the pocketbooks of new homeowners. The CEC staff proposal (cited above) accomplishes both goals: addressing climate change impact on the grid while still maintaining critically needed summer peak load reduction strategies.