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Trane Technologies Comments; RFI - Building Energy Performance Strategy Report

Additional submitted attachment is included below.



Date: June 26, 2024
Subject: Request for Information and Input on the California Building Energy Performance Strategy Report (Docket No. 24-BPS-01)
Company name: Trane Technologies
Company contact: Jennifer Kane
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Jennifer.kane@tranetechnologies.com

Thank you for the opportunity to provide input to the California Energy Commission (CEC) regarding the development of the California Building Energy Performance Strategy Report required by Senate Bill 48. Trane Technologies commends the CEC for their efforts to measure and improve the energy consumption in existing buildings in California. Existing buildings present one of the greatest opportunities for energy and carbon savings, since of the buildings that will exist in 2030, 75 to 80 percent have already been built. [1] We strongly support upgrading existing buildings as a system to maximize energy and emissions reduction, and support statewide adoption of performance-based building performance standards. Please find responses to the RFI below.

Stakeholder Contact Information and Areas of Interest:

1. Name & email address of public contacts for Trane Technologies

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Jennifer Kane, Jennifer.kane@tranetechnologies.com
Helen Walter-Terrinoni, Helen.Walter-Terrinoni@tranetechnologies.com
Melissa Banks, MelissaJ.Banks@tranetechnologies.com

1.2. Areas of interest

CEC may wish to consider existing industry standards as a model for their statewide building performance standards. ASHRAE Standard 100-2024 “Energy and Emissions Building Performance Standard for Existing Buildings” was created to be the model standard for jurisdictions looking to adopt a building performance standard. ASHRAE Standard 100 establishes energy and carbon performance targets for existing buildings, creates requirements for operations and maintenance, and establishes common enforceable language for jurisdictions to adopt. We are particularly interested in how CEC plans to use existing resources like ASHRAE 90.1 to encourage consistency across jurisdictions, and are happy to offer our expertise in interpreting these standards or making amendments to meet state-specific needs.

1.3. Description of organization



Trane Technologies is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. Our own greenhouse gas (GHG) emissions reduction targets challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

1.4. *Best way to engage*

We are excited to engage with CEC during all opportunities for public participation, including workshops and comment requests, and also encourage CEC to reach out to us directly to discuss particular questions that our technical and policy experts may be able to answer related to building performance and sustainability.

Building Benchmarking and Performance

2. *What building performance metrics (such as site energy use intensity, carbon dioxide equivalent emissions, or peak electric demand) should be considered in a building performance strategy? What building performance metrics could be used to trigger building-level interventions (such as enforcement, incentives, etc.)?*
3. *What building specific conditions and circumstances (such as vintage, climate zone, orientation, etc.) should be included in a building performance strategy?*
4. *How should building benchmarking data be used to prioritize building upgrades and incentives?*
5. *What types of support and resources would be necessary to help building owners meet building performance targets?*
6. *What enforcement mechanisms should be considered for both benchmarking and a potential building performance requirement? Which similar programs are known to achieve high compliance rates?*
7. *What other steps can the CEC take to help building owners comply with existing building benchmarking requirements?*

Load Flexibility and Resiliency

8. *Given the time and location dependance of both the cost and greenhouse gas emissions of electricity, how can building performance strategies be structured to incorporate load flexibility benefits?*

Cost Effectiveness

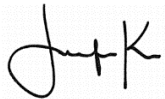
9. *How should measure cost effectiveness be incorporated into building performance strategies or requirements? How should cost effectiveness be determined?*
10. *For future building performance policies, how can the state manage and minimize administrative costs to the state and local governments while maximizing building performance improvements?*
11. *What considerations or protections should the CEC be aware of to ensure minimal impacts to housing affordability and other potential disruptions for multifamily tenants that may result from a statewide building performance standard?*

Other Comments, Issues, and References

12. *Please submit any additional comments, issues, references, models, recommendations, or other information that you believe is relevant to the development of the California Building Energy Performance Strategy Report*

Thank you again for the opportunity to provide feedback on this RFI. Please do not hesitate to reach out for further discussion.

Sincerely,



[1] Jose Luis Blanco et al. "Call for action: Seizing the decarbonization opportunity in construction," McKinsey & Company, last modified July 14, 2021, <https://www.mckinsey.com/industries/engineering-construction-and-buildingmaterials/our-insights/call-for-actionseizing-the-decarbonization-opportunity-inconstruction>