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## **Docket No 24-BSTD-02 I-REN CALGreen 45 Day Comments**

Please find attached comments submitted by Western Riverside Council of Governments on behalf of the Inland Regional Energy Network (I-REN) for CALGreen 45 Day Comments.

*Additional submitted attachment is included below.*



[iren.gov](http://iren.gov)

**July 1, 2024**

California Energy Commission Docket Office, MS – 4  
Re: Docket No. 24-BSTD-02  
1516 Ninth Street  
Sacramento, CA 95814  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

## RE: I-REN Comments on 2025 CALGreen Rulemaking, 45-day Language

Dear Commissioners and Staff,

The Inland Regional Energy Network (I-REN) respectfully submits these comments in support of the changes proposed in the rulemaking process for the 2025 Green Building Energy Efficiency Standards (CALGreen) to the California Energy Commission (CEC). I-REN appreciates the leadership that CEC has shown in the development of Title 24, Part 11, and would like to recognize the CEC's successes in incorporating building industry feedback.

I-REN is a collaboration among three California local inland governments (Coachella Valley Association of Governments, San Bernardino Council of Governments, and Western Riverside Council of Governments) established to actively participate in California's clean energy initiatives and build a stronger clean energy economy throughout communities in Riverside and San Bernardino counties. I-REN implements a dynamic and targeted set of programs to assist local government agencies in better understanding and enforcing the Energy Code, including its Codes & Standards program, which supports and trains local building departments and the building industry to enable long-term Energy Code compliance.

When reviewing the proposed changes, I-REN has kept the following guidelines in mind:

- Code should align with California's energy goals.
- To the extent possible, code requirements should be clear and consistent, to enable a streamlined code that is approachable and understandable.
- Code requirements should reflect the feedback of building industry stakeholders about implementation and compliance needs.
- Code requirements should be cost effective, even for underserved and hard-to-reach stakeholders.

**I-REN supports the updated Long-Term System Cost (LSC) performance compliance margins based on the proposed 2025 two heat pump baseline updates in Title 24, Part 6, plus the verified low-leakage ducts in conditioned space (VLLDCS) and compact hot water distribution (CDHW) measures established by climate zones.**

The two heat pump baseline updates in Title 24, Part 6 have been shown to be cost effective. Requiring VLLDCS in some climate zones and not in others has also shown to be cost effective.

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our region.



I-REN supports including Climate Zone 15 in the updated LSC performance compliance margins based on the two heat pump baseline updates plus the VLLDCS and CDHW measures because local jurisdictions can consider additional savings beyond LSC savings in their cost-effective analysis.

**I-REN supports the new proposed prescriptive standards for altered space conditioning systems and the corresponding exceptions to this measure.**

These proposed standards requiring a heat pump when replacing air conditioning systems in existing single-family homes support California's energy and climate goals. Because this measure could not be adopted into Title 24, Part 6, I-REN supports this measure being adopted here in Part 11. The shift toward heat pumps also supports efforts to improve air quality in the Inland Empire, which is a significant concern in this region.

Regarding the exception to this measure for Climate Zone 15, I-REN recognizes CEC's efforts to address cost-effectiveness as local jurisdictions can consider additional savings in their cost-effective analysis. I-REN joins the comment of the manager of the Statewide Codes & Standards Reach Codes Program at the June 4 Lead Commissioner Hearing in encouraging the CEC to extend technical support to local jurisdictions in Climate Zone 15 who would want to consider additional savings in their cost effectiveness analysis.

**I-REN supports the addition of outdoor lighting standards that prevent light pollution and increase lighting efficiency.**

The proposed standards are designed to prevent light pollution from outdoor lighting and minimize glare so lighting is used more efficiently. These standards are in line with California's energy goals.

**I-REN supports the new voluntary measures for altered pool and/or spa heating for multifamily homes which support solar thermal pool heating systems, heat pump pool heaters, or on-site renewable energy.**

The new voluntary measures support solar thermal pool heating systems, heat pump pool heaters, or on-site renewable energy, which is in line with California's energy and climate goals. I-REN supports the exceptions to the measure for portable electric spas or pools or spas heated solely by a solar pool heating system, as well as the proposed exception for inadequate solar access roof area.

Finally, as a general comment: I-REN appreciates that the CEC had made significant effort in this revision to propose updates that help the code to stay organized, current, and understandable. Maintaining clear and concise language is critical to ensuring ongoing compliance with CALGreen.

We appreciate the opportunity to review the proposed code language and provide comment. I-REN looks forward to working with the CEC and regional stakeholders to provide updated training and education materials, and to support the rollout of the 2025 Green Building Energy Efficiency Standards.

Respectfully submitted,  
/s/ Casey Dailey .

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