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**CEA Letter 3 of 3_Comments on 2025 BEES - Title 24 Parts 1 and
6_Express Terms_15-day Language**

CEA Comments Letter 3 of 3 - Supplementary Sections/Reports

Additional submitted attachment is included below.



June 28, 2024

California Energy Commission
Docket #24-BSTD-01
715 P Street
Sacramento, CA 95814

Re: Docket Number: 24-BSTD-01 – 2025 Building Energy Efficiency Standards, Title 24 Parts 1 and 6, Express Terms, 15-Day Language

CEA Comment Letter 3 of 3: Supplementary Sections/Reports

Dear CEC Commissioner McAllister and Staff,

Thank you for the opportunity to provide comments on the California Energy Commission's (CEC) 2025 Building Energy Efficiency Standards, Title 24 Parts 1 and 6, Express Terms, 15-Day Language (Energy Code).

The California Energy Alliance (CEA) is a leading advocacy organization for California's energy stakeholders. CEA and its Members had the opportunity to provide comment letters on the 45-Day Energy Code Language (Docket No: 24-BSTD-01, TN#s 256329, 256330, & 256331). CEA is grateful to see the CEC adopt many of the recommendations from these comments and applaud you for listening to industry stakeholders and making the necessary updates to the Energy Code to continue reducing greenhouse gas emissions by maximizing efficiency.

While the above recommendations were generally accepted, CEA would like to comment on and address continued areas of concern in the 2025 Energy Code Express Terms, 15-Day Language. CEA is submitting (3) separate comment letters to address distinct areas of the Energy Code (Lighting/Electrical Sections, Mechanical Sections, and Supplementary Sections/Reports).

The following comments and recommendations (CEA Comment Letter 3 of 3) relate to "Supplementary Sections/Reports" in the Energy Code (TN# 256847):

- 1) CEA encourages the CEC to reconsider comments submitted in the 2025 Title 24 Lighting Language Cleanup Initiative (Docket No: 22-BSTD-01, TN# 250676) report regarding useability and functionality of the Energy Code.**
 - a) The Energy Code Structure Subcommittee from the Title 24 Cleanup Initiative looked beyond the lighting sections of the code and focused recommendations on the entire framework of the Energy Code.
 - i) Create an online version of the Energy Code on the CEC's website and add modern digital features in compliance with ADA requirements to improve accessibility and compliance.
 - ii) Reorganize Energy Code to improve accessibility and reduce lookup time.
 - (1) Move Tables to follow the language where it is first introduced.
 - (2) Capitalize (maybe Italicize) defined terms.
 - iii) Add periods after sub-section letters and numerals, for example, Section 170.2(c)4Niv would change to Section 170.2(c)4.N.iv. By updating the subsection naming convention, it will support moving the code to an online format and help with the incorporation of regulations into software.
 - iv) Update/add a better reference to Healthcare Facility(ies) throughout the Energy Code to properly reference this exempted space type to reduce ambiguity related to the code sections that reference healthcare facilities.
- 2) 2025 Energy Code, 15-Day Language - PDF Bookmark Issues**
 - i) It appears the CEC tried to bookmark more sections of the Energy Code to support easier navigation, however, the 45-Day Language PDF had bookmarks for countless subsections and lines in the Energy Code. This made the PDF bookmarks unnavigable.
 - ii) The 15-Day Language PDF removed all of the 45-Day Language bookmarks except for Section 10-101 through 10-116.
 - iii) CEA recommends addressing these bookmark issues in the release of the Final 2025 Building Energy Efficiency Standards.
- 3) Section 10-102 – Concerns with Naming of Energy Code Compliance Program**
 - a) The change from HERS to ENERGY CODE COMPLIANCE (ECC) PROGRAM is not appropriate and will create confusion. The Acceptance Test Technician (ATT) program also covers ENERGY CODE COMPLIANCE (ECC). The proposed name change should be adjusted to represent the program's limited scope ("residential construction"). This proposed change is for all locations containing "ECC". While multiple organizations, including



CEC staff (Joe Loyer), have acknowledged confusion with the proposed ECC name change, the 15-Day Language did not address this concern that many stakeholders expressed in 45-Day Language comment letters.

- b) CEA highly recommends the CEC address this naming concern with the proposed name "RESIDENTIAL ENERGY CODE COMPLIANCE (RECC) PROGRAM", and we suggest that the CEC implement this proposed name for all locations/references containing "ECC".

4) Section 100.0, Table 100.0-A

- a) Demand response is not an occupancy type. Instead of adding rows for 110.12, CEA recommends inserting 110.12 in the existing row where applicable.

5) Sections 160, 170, 180 - Noted Discrepancies in Multifamily Building Requirements

- a) CEA aims to develop and advocate for measure proposals for building energy code improvements that will deliver energy savings, reduce costs, increase code compliance, and move California closer to its energy and environmental goals. We feel Sections 160, 170, and 180 in the energy code regarding multifamily buildings create more complexity and repetition. This increasing complexity translates into more significant challenges understanding and implementing the code which will surely reduce code compliance. As noted by many CEA Members, there are discrepancies between information in the multifamily sections and other parts of the code from which it has been assembled. Additionally, this is not consistent with other standards such as ASHRAE 90.1 and IECC.
- b) We recognize and appreciate all the work the CEC has done to create this multifamily section, but the CEA requests this multifamily language be removed or refer to previous code sections where applicable. This will allow CEA and its Members to thoroughly review the changes and support in educating energy stakeholders on these updates to ensure code compliance.

CEA thanks the CEC for the opportunity to submit these comments, and we look forward to answering any questions or comments regarding our recommendations to the 2025 Energy Code Express Terms, 15-Day Language.

Sincerely,

California Energy Alliance
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