

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-BSTD-07
<b>Project Title:</b>	Local Ordinance Applications Exceeding the 2022 Energy Code
<b>TN #:</b>	258426
<b>Document Title:</b>	City of Palo Alto Cover Letter
<b>Description:</b>	Plain text of City of Encinitas application cover letter to CEC
<b>Filer:</b>	Anushka Raut
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	8/9/2024 4:07:17 PM
<b>Docketed Date:</b>	8/9/2024



CITY OF  
**PALO  
ALTO**

**PLANNING & DEVELOPMENT SERVICES**

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June 18, 2024

Drew Bohan  
CEC Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Application for City of Palo Alto Locally Adopted Palo Alto Municipal Chapter 16.17  
2022 California Energy Reach Code - Ordinance 5627**

Dear Mr. Bohan,

On June 3, 2024, City Council conducted a public hearing regarding the adoption of Ordinance 5627 mandating the enclosed Energy Reach Code ordinance. The second reading and formal adoption was conducted on June 17, 2024.

At these meetings, City Council determined that Ordinance 5627 meets the requirements under the 2022 California Administrative Code (CAC) Section 10-106(a) for cost-effectiveness. It was also determined that buildings constructed under these locally proposed energy standards will consume less energy than permitted by the 2022 California Energy Code, Part 6. Cost-effectiveness studies by TRC Energy Services, Frontier Energy Inc, and Misti Bruceri & Associates, LLC supports these determinations.

We have written our ordinance to have an effective date following the acceptance of this ordinance by the California Energy Commission as required by CAC Section 10-106(b).

Enclosed with this application are the following:

1. Energy Reach Code Ordinance 5627 and City Council staff reports outlining requirements for an Hourly Source Energy (HSE) Performance Approach Margin Code ("One Margin") for new construction and substantial remodels in residential and non-residential buildings.
2. Compliance Reality Testing Analysis using City of Palo models for locally proposed energy standards.

City Council also found that under the California Environmental Quality Act pursuant to Section 15061(b)(3) of the CEQA Guidelines, there is no possibility that the implementation of this ordinance will have a significant negative impact on the environment and this is exempt from the requirements of CEQA.

Please consider and accept enclosed Ordinance 5627 pursuant to the 2022 California Administrative Code Section 10-106(b).

Please contact me at (650) 329-2368 or at [George.Hoyt@cityofpaloalto.org](mailto:George.Hoyt@cityofpaloalto.org) if you have any questions or I can provide additional information.

Respectfully,

George E. Hoyt, CBO, CASp, CCEO, LEED AP BD+C  
Chief Building Official / ADA Coordinator