

DOCKETED	
Docket Number:	24-BSTD-02
Project Title:	2025 CALGreen Rulemaking
TN #:	258730
Document Title:	CA Statewide Utility Codes and Standards Enhancement Team Comments - CASE Team and CI Team Comments to 2025 CALGreen Express Terms, 15-Day Language
Description:	N/A
Filer:	System
Organization:	CA Statewide Utility Codes and Standards Enhancement Team
Submitter Role:	Public
Submission Date:	8/29/2024 3:56:22 PM
Docketed Date:	8/29/2024

Comment Received From: CA Statewide Utility Codes and Standards Enhancement Team

Submitted On: 8/29/2024

Docket Number: 24-BSTD-02

CASE Team and CI Team Comments to 2025 CALGreen Express Terms, 15-Day Language

Additional submitted attachment is included below.

Statewide CASE Team Comments on 2025 CALGreen Rulemaking Express Terms

Docket Number 24-BSTD-02

August 29, 2024

Commissioner McAllister and Building Standards Office staff,

The Statewide Utility Codes and Standards Enhancement Team (Statewide CASE Team) and utility Compliance Improvement Team appreciate the opportunity to provide the California Energy Commission (CEC) comments on the 15-Day Express Terms for the 2025 California Green Building Standards Code (Part 11, Title 24, or CALGreen).

We recommend five revisions to improve the clarity and enforceability for both the pool heating and the lighting requirements.

1. **Modify pool heating definition for consistency with Part 6.** In Section 202 of the CALGreen 15-Day language, the definition of the term Solar Pool Heating System uses the word “designated”, while the Part 6 15-Day language uses the word “designed”. We recommend the following change to the CALGreen definition for consistency:
 - a. **“SOLAR POOL HEATING SYSTEM. [CEC]** An assembly of components ~~designated~~ designed to heat water for swimming pools, spas, or swimming pool and spa combinations by solar thermal means, excluding pool recirculation components.”
2. **Correct the language related to luminaire tilting requirements.** In Exception #3 to Section A4.203.1.3, and in Exception #2 to Section A5.203.1.1.2, the language appears to have been copied from sections in Part 6 related to light distribution cutoff. These sections in Part 11 are related to luminaire tilting. There is not a direct relationship between whether the light from a luminaire is cut off/shielded and whether a luminaire is tilted. Tilting a luminaire is not a recommended method to compensate for cutoff light distribution. We recommend the following change to the CALGreen language in both Appendix A4 and Appendix A5:
 - a. “Lighting not permitted by a health or life safety statute, ordinance, or regulation to ~~be a cutoff limit~~ luminaire tilt angle.”

3. **Modify pool heating charging language for consistency with Part 6.** The pool heating language in the 15-Day Express Terms for Part 6 [Section 110.4(c)] expanded the options from three to five, as has also been done for Part 11 [Section A4.204.1.2 and Section A5.204.1.1]. However, we recommend that the following language be modified for consistency and clarity:
 - a. **“Heating Source Sizing.** Heating systems or equipment for pool and/or spa shall meet one of the sizing requirements of 1, 2, or 3 through 5.”
4. **Modify reference to heat pump pool heater controls.** The second option in Section A4.204.1.2 and A5.204.1.1 incorrectly refers to Section 110.2(d). We recommend the following change to the CALGreen language in both Appendix A4 and Appendix A5:
 - a. “A heat pump pool heater as the primary heating system that meets the sizing requirements of Reference Joint Appendix JA16.3. The control for the heat pump pool heater shall meet the requirements specified in Title 24, Part 6, Section 110.4(d) 110.2(d). The supplementary heater can be of any energy source; or”
5. **Provide clarification regarding portable electric spas.** For consistency with Title 24, Part 6, we recommend the following modification to Exception #1 to Section A4.204.1.2 and to Exception #1 to Section A5.204.1.1:
 - a. “Portable electric spas compliant with 20 CCR §1605.3(g)(7) of the Appliance Efficiency Regulations.”

The Statewide Utility Team supports the CEC’s efforts in providing a path for local governments to adopt an ordinance that encourages heat pump installations when air conditioners are replaced in single family homes. This work has considered the various important nuances of such an ordinance, including technical feasibility, utility costs, first costs, implementation, and enforcement.

We applaud the CEC’s commitment to support jurisdictions considering adopting the CALGreen requirements. This process may include modifying the language to suit local needs. The utility-led Local Energy Codes program works closely with jurisdictions to identify regionally appropriate, cost effective, and legally defensible strategies, and we look forward to continuing to do so with the CEC.

Local adoption of CALGreen is especially important in the existing buildings sector, where there is tremendous potential for energy and greenhouse gas emission reductions. The Local Energy Codes program and the Statewide CASE Team are motivated to improve coordination between Title 24, Part 6 and Title 24 Part 11, to help familiarize the market with the more advanced energy and GHG-reducing approaches in CALGreen for consideration as future proposals in Part 6.

Thank you for considering these comments and for the constructive dialogue that went into developing and updating the 2025 CALGreen requirements. We support CEC's efforts to improve the practical experience implementing CALGreen which could lead to sustained energy savings and reduced greenhouse gas emissions. Our team is available to assist CEC staff in resolving concerns or outstanding issues.