Response to RFI and Input on the CA Building Energy Performance Strategy Report

Additional submitted attachment is included below.

Nico Predock, City of Santa Monica, Response to RFI and Input on the CA Building Energy Performance Strategy Report

Docket 24-BPS-01

Stakeholder Contact Information and Areas of Interest

1. Please provide the following information about you and/or your organization:

1.1. Names & email addresses of public contacts for you and your organization.

- Nico Predock – nico.predock@santamonica.gov

1.2. What are your areas of interest in this report development process?

- We're interested in the development and implementation of Statewide BPS. Given many cities are developing local BPSs to support our existing building decarbonization efforts, it would be great to have statewide BPS resources align with local BPS requirements as well.

1.3. Description of your organization and the constituency you represent.

- I work for the City of Santa Monica in the Office of Sustainability and the Environment. To meet goals outlined in the City's Climate Action and Adaptation Plan, the City must enact a Building Performance Standards policy to reduced GHG emissions from the existing building sector.

1.4. What is the best way to outreach and engage with your constituency?

- Directly with OSE. Through my contact: nico.predock@santamonica.gov or my supervisor's: ariana.vito@santamonica.gov

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.)?

- A combination of different metrics should be considered in the BPS policy. Whichever metric(s) are used, they should align with the State's goal to be net zero carbon emissions by 2045 and the final BPS target should be established alongside interim targets so it's clear to building owners what they're trying to achieve.
- An emissions-based metric would allow the State BPS targets to directly align with the State's climate goals and would provide clear direction to building owners of the ultimate goal to transition off fossil fuels.
- An Energy (or EUI) metric would help buildings prioritize energy efficiency which is critical to reducing overall energy use, utility bills, and demand on the grid. However, an energy/EUI metric alone may result in the installation of new efficient gas systems/appliances rather than electric alternatives. These new systems would be in place and burning fossil fuels for 15+ years and it would not further the State's overall emissions goal.

- Using both a GHGI and EUI metric together would prevent inefficient electrification and would help save property owners money on utility bills while reducing carbon emissions.

4. How should building benchmarking data be used to prioritize building upgrades and incentives?

- Benchmarking data should be cross-referenced with CalEnviroScreen or similar datasets to prioritize supporting high-energy users within disadvantaged communities with building upgrades.
- Benchmarking data can provide valuable information to set performance targets for different building types.

5. What types of support and resources would be necessary to help building owners meet building performance targets?

- Create a statewide building performance hub that is implemented locally in each region. Several cities across the US have adopted building performance standards and created complementary support programs to help their buildings meet the new requirements. These hubs should provide assistance to building owners on BPS target and compliance path considerations, and support navigation of and access to TECH, Equitable Building Decarb Program, and other incentives for stacking.
- Create a robust ecosystem of online resources for building owners, including compliance guides for various building types, policy compliance checklists and pathway selection tools, lists of financial resources, such as available incentives and financing mechanisms, and case studies of buildings that have met the BPS. The Switch is On is a good example of a statewide tool that helps homeowners decarbonize their buildings. There is not a similar centralized resource for large commercial/residential buildings.
- There is a significant need to support equity priority buildings in funding building upgrades. The CEC should explore providing incentives and rebates to help off-set the cost of BPS compliance. Equity Priority Buildings should be prioritized to receive funding through an EPB program. This program should identify and offer additional support to eligible buildings.

7. What other steps can the CEC take to help building owners comply with existing building benchmarking requirements?

- Some of the challenges to benchmarking include accessing whole building local utility data as well as historical utility data. We've experienced many issues with SCE's and SoCalGas' Building Benchmarking Portals, including data gaps, data transfer errors, and issues accessing the portal in general. These issues have made it laborious for some building owners to submit their data each year. The CEC should explore standardizing the way building owners are able to access their whole building data across utilities and require utilities to address data access issues promptly.

Cost Effectiveness

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?

- The CEC should explore shared software solutions that local governments can access to implement local BPS. Staffing and software costs are some of the biggest administrative challenges for cities when implementing new programs. By administering a BPS software solution at the State level, the State could create workflows, automations, and incorporate business logic to minimize local administration needs. A shared software can also help building owners who have buildings in many jurisdictions by allowing them to access all their information in one place.
- From a policy perspective, a shared BPS platform would also allow local jurisdictions that have not already enacted BPS to opt in or out of the statewide program.