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Post-Workshop Response to 12-18-2024 Compliance Workshop

Additional submitted attachment is included below.



January 28th, 2025

Dear Commissioner McAllister and Commissioner Skinner,

The California Energy Alliance expresses support for the comments that CodeCycle.org submitted to Docket 24-BSTD-05 on January 10, 2025. In particular, CEA **supports the need for greater clarity in how the California Energy Commission calculates the impact of noncompliance of Title 24, Part 6 to Californians and energy efficiency standards.** The following points are worth emphasizing:

- It is crucial for the CEC's analysis to address noncompliance with all applicable provisions of Title 24, Part 6, not just the 2022 additions. CEA has repeatedly stressed this point.
- Because most Acceptance Testing requirements were adopted before Title 24 2022, Acceptance Testing shortfalls to California businesses are not reflected in the CEC's analysis. By only assessing the 2022 CA Title 24, Part 6 additions to the code, these impacts are ignored.
- The 1-year lifecycle analysis should be removed, as Title 24, Part 6 efficiency measures last far longer than one year.
- As the CEA recommended previously, an alternate approach would be for the CEC to assess the average Effective Useful Life (EUL) of each class of measures, which are represented in each row and use that period of analysis instead. The CEC has data on EULs in CASE reports. At a broad level, new construction might be 30 years and for alterations it might be 20 years.
- The CEC should halt further suggestions that the 1-year lifecycle analysis uses the Long-term System Cost (LSC) metric.

Thank you for making the presentation and recording of the December 18th Compliance Workshop available on the docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Nica C. Tanaka".

Nica C. Tanaka
Executive Director
California Energy Alliance