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ATTACHMENT TO
FULLY EXECUTED ECONOMIC IMPACT STATEMENT
January 3, 2018

All California Energy Commission mandatory building energy efficiency regulations are found in provisions of the California Building Code, Parts 1 and 6 (the Energy Code). The California Energy Commission cannot provide any estimated costs or claim any estimated savings for the voluntary building energy efficiency provisions in the California Building Code, Part 11 (CALGreen Code). By definition the CALGreen energy efficiency provisions have no force or impact unless they are imposed by a local jurisdiction through the passage of a local ordinance. Without the force of a local ordinance, no savings or costs can be realized or claimed by any government agency. The act of enacting a local ordinance places the responsibility for the associated costs and savings on the locality that passes the ordinance.

At practical level, any attempt to estimate the costs and savings associated with the CALGreen voluntary provisions faces insoluble technical challenges. Any credible estimate of the statewide costs and savings impact from the CALGreen voluntary provisions would require defensible assumptions or data regarding the following:

- The local jurisdictions that will impose some level of mandatory building energy efficiency requirements that are more stringent than the Energy Code, based on the CALGreen voluntary provisions. It is important to emphasize that last part – “based on the CALGreen voluntary provisions” — because not all local ordinances that implement beyond code requirements follow the recommendations made in the CALGreen code. Past local ordinance enactments cannot be credibly used to estimate this because the Energy Code becomes increasingly stringent with each code cycle, leaving fewer and fewer opportunities to exceed its requirements. The proposed 2019 Energy Code will require many newly constructed residential buildings to be relatively close to zero net energy.
- The extent to which those local jurisdictions will impose CALGreen voluntary provisions as requirements beyond the Energy Code. As noted in the previous bullet above the proposed 2019 Energy Code will require many newly constructed residential buildings to be nearly zero net energy. However, a local jurisdiction may require beyond code energy efficient construction across a spectrum – bounded by just beyond the Energy Code at one end and zero net energy (or beyond that “carbon neutral”) construction at the other.
- The technology those local jurisdictions would require builders implement in order to meet their beyond Energy Code requirements. Buildings are complicated “systems” and there are multiple methods or technologies that might be implemented to increase a building’s energy efficiency beyond the current Energy Code requirements.