

DOCKETED

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Supports the Adoption of the 2019 Title 24, Part 6 Standards

Additional submitted attachment is included below.

In the matter of:) Docket No. 17- BSTD-02
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2019 Title 24, Part 6, Building Energy) RE: 2019 Building Energy
Efficiency Standards Rulemaking) Efficiency Standards

The Southern California Public Power Authority (SCPPA) strongly supports the adoption of the 2019 Title 24, Part 6 Standards. The proposed changes to the building code, as presented in the 15-Day Language, balance many interests and provide feasible, enforceable, and cost-effective enhancements to the building energy efficiency standards that will allow for cost-effective ways to help Californians reduce energy use and greenhouse gas emissions.

SCPPA is a joint powers agency whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly owned electric utility governed by a board of local officials. Our Members collectively serve nearly five million people in Southern California, offering energy efficiency programs and enforcing building codes in the communities they serve.

The 2019 Title 24 proceeding was the first time that SCPPA sponsored a Codes and Standards Enhancement (CASE) study as part of the state’s building code update process and is pleased to have been a part of the Statewide CASE Team. SCPPA administered the Lab Fume Hood CASE study on behalf of its members as well as the Cities of Biggs, Lompoc, Roseville and The Plumas Sierra Rural Cooperative, all of whom are members of the Northern California Power Agency and the city of Moreno Valley, Modesto and Turlock Irrigation Districts and the Sacramento Municipal Utility District, who are members of the California Municipal Utility Association. These publicly owned utilities worked together with the four California Investor Owned Utilities – Pacific Gas and Electric Company, San Diego Gas and Electric, Southern California Edison and SoCalGas® – to support this effort.

SCPPA commends the Commission and Staff for the open dialogue and collaborative efforts with all stakeholders throughout the proceeding that has led to the proposed code updates. In that vein, SCPPA encourages the Commission to consider and accept the proposed revisions and improvements to the code language, as submitted by the Statewide CASE Team, that will make the language easier to read and allow for improved compliance and enforcement.

We thank you for this opportunity to engage and inform the Commission on this important issue.