



October 23, 2019

Mr. Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street, MS-37
Sacramento CA 95817-5512

RE: Application for Locally Adopted Energy Efficiency Standards by the City of Davis in Accordance with Section 10-106 of the California Code of Regulations, Title 24, Part 1.

Dear Mr. Bohan

At the Davis City Council regular meeting on September 24, 2019 the Council conducted a public hearing and approved an ordinance mandating the following:

- (a) **New single-family dwellings.** New mixed-fuel, single-family dwellings shall be required to meet a Total Energy Design Rating (EDR) margin of 9.5 as defined by the 2019 California Energy Code. In addition, the electrical system design shall provide capacity for a future retrofit to facilitate the installation of all electric appliances. This includes capacity and space at the electrical service panel, pre-wiring and installed circuit breakers for the following appliances:
 - 1) heat-pump water heater;
 - 2) induction stove top and oven;
 - 3) electric clothes dryer; and
 - 4) heat-pump for code-required comfort heating.

- (b) **New low-rise multifamily dwellings.** New mixed-fuel, low-rise multifamily dwellings shall be required to meet a Total Energy Design Rating (EDR) margin of 10 as defined by the 2019 California Energy Code. In addition, the electrical system design shall provide capacity for a future retrofit to facilitate the installation of all electric appliances. This includes capacity and space at the electrical service panel, pre-wiring and installed circuit breakers for the following appliances:
 - 1) heat-pump water heater (if applicable);
 - 2) induction stove top and oven;
 - 3) electric clothes dryer (if applicable); and
 - 4) heat-pump for code-required comfort heating.”

The City has obtained a cost effectiveness study prepared by Frontier Energy and Misti Brucerri and Associates. The cost effectiveness study demonstrates that single family dwellings and low-

rise multifamily dwellings in climate zone 12 have a market-ready and cost effective set of measures to achieve a Total EDR margin of 9.5 for single family dwellings and a Total EDR margin of 10 for low-rise multifamily dwellings. Thus, the City has the required justification for adopting these Total EDR margins in the reach code meeting the requirements of section 10-106 of the California Code of Regulations Title 24, Part 1.

This ordinance is intended to incentivize but not require all-electric single family and low-rise residential structures. This ordinance includes no reach code requirements for all-electric structures and because there is a code complaint path for all-electric structures, the city of Davis did not include a cost effectiveness study for all-electric energy code compliance.

I am currently serving on the CALBO Energy Commission Advisory Committee. As Chief Building Official for the City of Davis, I am committed to enforcement of Title 24, Part 6 within the City of Davis. Any exemptions or exceptions are applicable only to the proposed ordinance and do not apply to Title 24, Part 6.

Additionally, the City of Davis found that, under the California Environmental Quality Act pursuant to Section 15061(b)(3) of the CEQA Guidelines, there is no possibility that the implementation of the ordinance will have a significant negative impact on the environment and is thus exempt from the requirements of CEQA.

Enclosed with this application are the following:

1. Signed ordinance adopting the reach code as stated above and associated staff report.
2. Cost effectiveness study dated July 2019, demonstrating cost effectiveness of the specified Total EDR margins.

The proposed energy standards found in the City of Davis ordinance will require buildings to be designed to consume no more energy that permitted by Title 24, Part 6.

Please approve the enclosed ordinance pursuant to Public Resources Code, Subsection 25402.1(h)(2).

Sincerely,



Gregory Mahoney, CBO
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