

DOCKETED

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Comment Received From: CA Statewide Utility Codes and Standards Enhancement Team

Submitted On: 6/5/2023

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Draft CASE Reports Posted for Public Review

Additional submitted attachment is included below.

June 5, 2023

Re: Draft CASE Reports Posted for Public Review

Commissioner McAllister and Building Standards Office staff,

Thank you for the opportunity to participate in the 2025 Energy Code (Title 24, Part 6) update. The Statewide Utility Codes and Standards Enhancement (CASE) Team appreciates the California Energy Commission (CEC) providing an opportunity for stakeholders to engage in the pre-rulemaking process for updating the statewide building energy efficiency standards.

The Statewide CASE initiative presents recommendations to support the California Energy Commission's efforts to update California's Energy Code to include new requirements or to simplify or upgrade existing requirements for various technologies. Three California Investor-Owned Utilities (IOUs) — Pacific Gas and Electric Company, San Diego Gas and Electric, and Southern California Edison — and two Publicly Owned Utilities — Los Angeles Department of Water and Power and Sacramento Municipal Utility District — support this effort. The program goal is to prepare and submit proposals that would result in cost-effective enhancements to improve energy efficiency and energy performance, and reduce greenhouse gas emissions reductions in California buildings.

The Statewide CASE Team has posted 12 draft CASE Reports on Title24Stakeholders.com (<https://title24stakeholders.com/2025-cycle-case-reports/>) for review and comment by the California Energy Commission and all interested stakeholders in the energy code update process:

- Multifamily
 - [Compartmentalization and Balanced Ventilation / IAQ](#) – *Please provide comments as soon as possible*
 - [Domestic Hot Water](#) - *Please provide comments as soon as possible*
 - [Envelope](#) - *Comments Due June 12, 2023*
- Single Family
 - [Buried Ducts and Cathedral Ceilings](#) - *Comments Due June 19, 2023*

- [High Performance Envelope \(Windows and Walls\)](#)- *Please provide comments as soon as possible*
- Nonresidential
 - [Controlled Environment Horticulture](#) – *Please provide comments as soon as possible*
 - [Cooling Towers](#) – *Please provide comments as soon as possible*
 - [HVAC Controls](#) - *Please provide comments as soon as possible*
 - [HVAC Space Heating](#) - *Comments Due June 12, 2023*
 - [Refrigeration](#) - *Please provide comments as soon as possible*
 - [Swimming Pool and Spa Heating](#) - *Please provide comments as soon as possible*
 - [Process Load Pipe Insulation](#) – *Comments Due June 24, 2023*

An additional eight reports will be posted for public review. The CASE Reports follow the template that the CEC provided to all members of the public that want to submit code change proposals for consideration.

The Statewide CASE Team encourages comments on the proposed code changes and the analyses presented in the draft reports. Where feasible, stakeholders are also asked to provide data and justifications to support their comments.

For those reviewing the reports, we are requesting comments to be sent to info@title24stakeholders.com and the individual who is identified in the introduction section of the CASE Report. Comments are respectfully requested by the dates accompanying the CASE Report titles listed above. The Statewide CASE Team plans to evaluate and address comments before submitting final CASE Reports to CEC by the end of July.