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Staff Supplement to California Statewide Codes and Standards Enhancement (CASE) Team Measure Proposal for Multifamily Restructuring

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Description of Proposed Regulatory Changes

As it relates to multifamily requirements for slab perimeter insulation, fenestration product visible transmittance, skylights, central ventilation shaft sealing, field verification and diagnostic testing measures, verification of quality installation of insulation, and additions and alterations. The measure change proposal submitted by California Statewide Codes and Standards Enhancement (CASE) Team and titled "Multifamily Restructuring" proposes to make the following changes to the 2025 Standards:

1. Align requirements for low-rise multifamily (3 or fewer habitable story) and high-rise multifamily (4 or more habitable story) buildings as they relate to:
 - Slab perimeter insulation
 - Fenestration product visible transmittance
 - Central ventilation shaft sealing
 - Field verification and diagnostic testing
 - Verification of Quality Installation of Insulation (QII)
 - Additions and alterations restructuring
 - Alignment of these measures would eliminate instances of differentiation in requirements between low-rise and high-rise multifamily buildings. These changes include:
 - Removing 16 instances of "three or fewer habitable stories," and "four or more habitable stories."
 - Removing two rows from tables in the multifamily chapters.

2. Remove generic references to requirements outside of the multifamily chapters.
3. Improve consistency in the structure and outline of the three multifamily chapters for ease of navigation and clarity of requirements.

Staff agrees with the proposed changes and have incorporated substantively similar changes to the proposed 2025 Express Terms, with the exception of the following two items:

1. Introduction of QII to high-rise multifamily buildings: After consideration of this measure, staff concluded that this measure needs further development and engagement with stakeholders before proposing in this cycle to ensure that it can be implemented at a statewide level without significant challenges around compliance and enforcement.
2. Additions and alterations restructuring: After consideration of this measure, staff concluded that this measure should not move forward with the 2025 Energy Code cycle. Efforts by the CEC are currently underway to attempt to address the structure of the Energy Code, and staff believes a reorganization of this section as proposed during the 2025 cycle could unnecessarily complicate parallel efforts that are currently underway.

Staff Analysis and Conclusion

Staff analyzed the submitted proposal and reached the following conclusions for the measures included in the 2025 Express Terms:

- Based on the evidence presented in the proposal, the measures, as proposed, is cost effective and the author has appropriately followed the Energy Commission's Life Cycle Cost methodology.
- Measure costs premiums presented in the proposal are reasonable and appropriate for the measure proposed.
- Measure energy savings presented in the proposal have been appropriately modeled and are credible.
- Measure environmental impacts presented in the proposal are reasonable and appropriate for the measure proposed.