| DOCKETED |  |
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| Project Title: | 2025 Energy Code Rulemaking |
| TN : | 255784 |
| Document Title: |  <br> Massed Internal Walls + IR-rejecting Exterior Finish |
| Description: | N/A |
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| Organization: | Kurt Hurley |
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## Comments on Electric Readiness \& Massed Internal Walls + IRrejecting Exterior Finish

[1] On proposed 120.6(k) Commercial Kitchen Electric Readiness coordinate electric load capacity + electric service panel space requirements with the CALGreen EV Capable Space requirements at CGBSC 4.106.4.2.1 for intra-code consistency
[2] On JA12 BESS Compliance Cycling Capacity consider a (partial) exception for single family designs incorporating high thermal mass internal wall assemblies (e.g. increasing to a $12 \mathrm{Btu} / \mathrm{hr}$-sf wall assembly from the prescriptive massed exterior wall of $7 \mathrm{Btu} / \mathrm{hr}$-sf of Table $150.1-\mathrm{A}$ ) to achieve similar electric grid-friendly and load curtailment benefits. Increasing interior wall thermal storage / mass allows Single Family structures to coast thru heating and cooling extremes events with reduced active space conditioning. Consider also that electric appliance lifetimes of 12-15yrs compare unfavorable with that of $70 \mathrm{yrs}+$ for interior wall assemblies. The City of Berkeley would be open to collaboration on software modeling of adding massed thermal storage internal wall assemblies to a CEC prototype structure to quantify electric grid benefits and to establish a (prescriptive) baseline.
[3] Add a mandatory requirement in Section 160 for new Multifamily buildings over 3 stories to require an exterior finish minimum Aged Solar Reflectance e.g. CZ16 and other extreme CDD driven regions of CA to diminish exterior heat gains to building and reduce the building's air conditioning/cooling peak load contribution.

