

DOCKETED

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Docket No. 24-BSTD-01: 2025 Energy Code

The Inland Regional Energy Network (I-REN) respectfully submits these comments in support of the changes proposed in the rulemaking process for the 2025 Building Energy Efficiency Standards to the California Energy Commission (CEC).

Please find attached WRCOG Comments on 2025 Energy Code Rulemaking, 45-day Language on behalf of the Inland Regional Energy Network.

Please contact me if you have any questions.

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Additional submitted attachment is included below.



iren.gov

May 8, 2024

California Energy Commission Docket Office, MS – 4
 Re: Docket No. 24-BSTD-01
 1516 Ninth Street
 Sacramento, CA 95814
 docket@energy.ca.gov

RE: I-REN Comments on 2025 Energy Code Rulemaking, 45-day Language

Dear Commissioners and Staff,

The Inland Regional Energy Network (I-REN) respectfully submits these comments in support of the changes proposed in the rulemaking process for the 2025 Building Energy Efficiency Standards to the California Energy Commission (CEC). I-REN appreciates the leadership that CEC has shown in the development of the Energy Code, and would like to recognize the CEC's successes in incorporating building industry feedback.

I-REN is a collaboration among three California local inland governments (Coachella Valley Association of Governments, San Bernardino Council of Governments, and Western Riverside Council of Governments) established to actively participate in California's clean energy initiatives and build a stronger clean energy economy throughout communities in Riverside and San Bernardino counties. I-REN implements a dynamic and targeted set of programs to assist local government agencies in better understanding and enforcing the Energy Code, including its Codes & Standards program, which supports and trains local building departments and the building industry to enable long-term Energy Code compliance.

When reviewing the proposed changes, I-REN has kept the following guidelines in mind:

- Code should align with California's energy goals.
- To the extent possible, code requirements should be clear and consistent, to enable a streamlined code that is approachable and understandable.
- Code requirements should reflect the feedback of building industry stakeholders about implementation and compliance needs.
- Code requirements should be cost effective, even for underserved and hard-to-reach stakeholders.

I-REN supports the heat pump baseline updates for residential buildings across all climate zones, residential prescriptive heat pump requirements, and updates to multifamily heat pump requirements.

These changes have been shown to be cost effective, and the changes to the residential baseline will help establish a clear, consistent residential code for all climate zones. Critically, these changes will support energy and climate goals statewide. The shift toward heat pumps also

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our region.



supports efforts to improve air quality in the Inland Empire, which is a significant concern in this region.

In the pre-rulemaking process, I-REN noted that Climate Zone 15 was proposed as a potential exception to these changes due to cost effectiveness, based on some heating load assumptions that I-REN advised were potentially inappropriate. I-REN appreciates that these concerns have been reviewed, the heating load assumptions have been updated, and now there is a consistent requirement across all climate zones.

I-REN supports the proposed Controlled Environment Horticulture (CEH) language.

This proposed update to lighting for CEH is highly cost-effective. Indoor horticulture is prevalent in I-REN's service area and I-REN is excited to support this measure for its potential energy and cost savings.

I-REN supports the proposed mandatory requirement for thermal pool and spa heating systems in nonresidential, multifamily, and new construction single family homes with heated pools and spas.

These updates are cost effective and will save wasted energy, in line with California's energy goals. Additionally, I-REN appreciates that building industry feedback provided during the pre-rulemaking phase was taken into consideration.

I-REN supports PV and Energy Storage updates and supports the new categories of nonresidential buildings for storage requirements.

The new categories of nonresidential buildings for storage requirements will improve grid resiliency. Additionally, I-REN appreciates that the building industry feedback was taken into consideration to ensure optimal customer value for the investment in energy storage systems. I-REN supports updates to the solar heat gain coefficient (SHGC) for fenestration but seeks clarity on the language around exceptions.

The SHGC is limited to 0.23 in Climate Zone 15 (part of I-REN territory) for additions and alterations, per Section 150.2(b)1A. Based off language for exceptions in the prior code cycle, it may be clearer to use the word additions as opposed to alterations, so that Exception 1 adds an exception for any *additions* that add vertical fenestration in CZ 15.

Further, the replacement fenestration updates in Section 150.2(b)1B is also limited to a SHGC of 0.23 in CZ 15. However, Exception 1 currently allows for a SHGC of 0.35 for replacement of vertical fenestration less than or equal to 75 square feet. This presents a discrepancy between Exception 1 and Exception 3, and I-REN believes that Exception 1 should apply to CZs 6-14, not CZs 6-15.

I-REN is ready to support the CEC in making updates to the Home Energy Rating program, and requests that the CEC continue to gather and incorporate industry feedback on these changes.

Overall, I-REN supports the CEC's vision to make updates to the Home Energy Rating program. However, we have heard concerns about select changes, including some industry confusion about differentiating the roles that the HERS rater can play in a project, and about the proposed program name. In particular, I-REN recommends that the name reference the concept of "verification" to better align with the program goal, as the proposed "compliance" may unintentionally misrepresent program scope. As the CEC held a workshop on the proposed

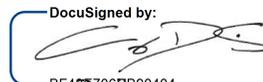
changes on April 30, we anticipate that the CEC will continue to gather and incorporate industry feedback to address these concerns.

Finally, as a general comment: I-REN appreciates that the CEC had made significant effort in this revision to propose updates that help the code to stay organized, current, and understandable. Maintaining clear and concise language is critical to ensuring ongoing Energy Code compliance.

We appreciate the opportunity to review the proposed code language and provide comment. I-REN looks forward to working with the CEC and regional stakeholders to provide updated training and education materials, and to support the rollout of the 2025 Energy Code.

Respectfully submitted,

/s/ Casey Dailey

DocuSigned by:


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