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## **3C-REN Comments on 45-Day Language**

*Additional submitted attachment is included below.*



TRI-COUNTY REGIONAL ENERGY NETWORK

SAN LUIS OBISPO • SANTA BARBARA • VENTURA

May 13, 2024

California Energy Commission  
Re: Docket No. 24-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Dear Commissioners and Staff,

The Tri-County Regional Energy Network (3C-REN) is pleased to submit these comments and recommendations on the 45-day language for the 2025 Building Energy Efficiency Standards to the California Energy Commission (CEC). The Tri-County Regional Energy Network (3C-REN) is a collaboration among three California Central Coast counties (San Luis Obispo, Santa Barbara, and Ventura) established to deliver energy-saving programs and industry trainings that help reduce energy use, strengthen local job markets, and support efforts to achieve climate goals. Prior to collaboration, each county had experience with local energy and sustainability programs. Coming together as 3C-REN allowed them to support counties at a regional level. These region-specific energy-saving programs and services are intended to address existing gaps in current programs based on the needs of local government agencies, building professionals, and residents throughout the region. A diverse group of underserved and hard to reach communities are at the core of 3C-REN's programs, as it looks to invest in the local workforce and support consumers.

Reaching both the public and private sector, 3C-REN's Energy Code Connect program provides building professionals with forums, trainings, and support services with the aim of increasing comprehension, compliance, and enforcement of California's energy code. Based on the knowledge 3C-REN has gained working with building industry professionals, it offers the following comments to changes proposed under the 2025 Building Energy Efficiency Standards:

**3C-REN understands that the CEC has found the residential heat pump requirements to be cost effective in all climate zones.**

In the pre-rulemaking phase, half of 3C-REN's climate zones showed a positive cost effectiveness ratio for expanded residential heat pump requirements, while half did not. At the time, 3C-REN requested exemptions for those climate zones where the measures did not prove cost effective. In the interim, the CEC has revised its calculations and found that the expanded requirements are cost effective in all climate zones.



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**3C-REN supports the push to increasingly electrify our built environment but urges the CEC to work with partners to support hard-to-reach communities that are least able to afford electrification upgrades and are most heavily impacted by rising electric rates.**

Electrifying our built environment with technologies such as heat pumps is a critical step to meet California's goal of carbon neutrality by 2045. However, 3C-REN has observed that its hard-to-reach communities are less able to incur the significant upfront costs associated with electrification requirements, and that its homeowners are not as actively applying for electrification incentives when compared to homeowners in other regions of California.

3C-REN is grateful that statewide electrification requirements in the code help remove a burden on local jurisdictions in establishing reach codes. 3C-REN encourages the CEC to partner with organizations offering electrification incentives to ensure these resources are made available to hard-to-reach populations.

**3C-REN respectfully requests some clarifications and modifications to the Energy Code Compliance program.**

The proposed changes from the HERS program to the new Energy Code Compliance (ECC) program raise a few concerns for 3C-REN. First, 3C-REN believes that the name "Energy Code Compliance" Rater will create confusion around the specific duties of the Rater and may cause a mix-up with the responsibilities of an energy consultant. As one of the most important goals for this program is to ensure that Energy Code measures are properly verified, 3C-REN believes "Verification" should be included in the name. 3C-REN plans to attend the branding workshop on the 30<sup>th</sup> to contribute to the process of brainstorming for the program name.

3C-REN also has concerns about transparency around the roles that HERS/ECC Raters and their companies will play in the building process. The CEC stressed the importance of third-party independence for verification and having clear standards to avoid conflict of interest. 3C-REN supports these goals but feels that the current language is not clear enough to achieve them. Section 10-103.3(f)2Diii, which addresses providing additional services while maintaining third party independence, could use further clarity on the ability for a single person to serve as the documentation author who creates the compliance documentation and consults with the client while also being the HERS/ECC Rater. 3C-REN also seeks further clarification on the boundaries of how a sole proprietor HERS/ECC Rater should act when they provide multiple services. The CEC indicated that services cannot be separated in a one-person company, which could potentially have a large impact on smaller businesses. While 3C-REN understands that the CEC wants to allow corporations multiple avenues to comply with the Energy Code in this area, it presently feels there is too much ambiguity around providing additional services while maintaining third-party independence for verification services.

Once the language is finalized, 3C-REN is available to work on the eventual roll-out of this program through its Energy Code Connect program.



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**3C-REN appreciates the CEC's revisions to the PV and energy storage proposed changes.**

Overall, 3C-REN supports the direction of the changes being made for solar PV and battery storage requirements. 3C-REN appreciates that the CEC has updated the solar sizing calculations and multipliers since pre-rulemaking, and the CEC's proposed expansion of building types impacted by PV system requirements. In future code cycles, 3C-REN hopes to see more models that assume all-electric buildings rather than mixed-fuel buildings as the baseline. Especially given the additional heat pump requirements proposed for the 2025 Energy Code, it follows that models should use increasingly all-electric buildings as the baseline.

Sincerely,

A handwritten signature in black ink, appearing to read "JG" followed by a surname.

Jordan Garbayo  
Energy Program Manager, Tri County Regional Energy Network

Cc: Alejandra Tellez – Co-Director, 3C-REN