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Project Title:	2025 Energy Code Rulemaking
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Document Title:	ARCXIS Comments 2025 Building Energy Efficiency Standards, Express Terms, 45-Day Language Second Set of Comm
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Comments on 2025 Building Energy Efficiency Standards, Express Terms, 45-Day Language [Docket No 24-BSTD-01] Second Set of Comm

Additional submitted attachment is included below.



May 28, 2024

David Hochschild, Chair California Energy Commission 715 P Street Sacramento, CA 95814

RE: Comments on 2025 Building Energy Efficiency Standards, Express Terms, 45-Day Language [Docket No. 24-BSTD-01] Second Set of Comments

Dear Chair Hochschild:

ARXCIS respectfully submits these comments (second set) on the 2025 Building Energy Efficiency Standards, Express terms, 45-Day Language ("45-Day Language"), issued on March 28, 2024. California Energy Commission staff reached out to stakeholders to clarify the proposed quality assurance requirements for homes that are deemed compliant via the sampling process.

To ensure the new requirement is not overly cumbersome, we support a change to the language that would quality assurance of houses on a 1 per 100 ratio. Given the objectives for doing quality assurance on untested lots included in a sample, in addition, we believe this quality assurance should be upon a certain percentage of lots and not require that the lots selected be from a sample in which the tested lot had quality assurance performed. This will make this easier and more cost effective to implement while still meeting Commission objectives.

We appreciate the commission staff's willingness to discuss this issue with stakeholders.

Sincerely,

-DocuSigned by:

Jonathan Risch

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Cc: Commissioner McAllister