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2025 Title 24 CASE Team comments on August 2024 Express Terms

Additional submitted attachment is included below.

Comments on August 2024 Express Terms for 2025 Title 24, Part 6 and Part 1, Chapter 10

Docket Number 24-BSTD-01

August 30, 2024

Introduction

The California Statewide Utility Codes and Standards Enhancement (CASE) and Compliance Improvement (CI) Teams appreciate the opportunity to review the August 2024 Express Terms for the proposed revisions to the 2025 Building Energy Efficiency Standards, Title 24, Part 6 and Part 1, Chapter 10 (August 2024 Express Terms). We commend the California Energy Commission (CEC) for encouraging public participation in the proceeding and value the opportunity to offer suggestions to refine the code language.

The CASE initiative presents recommendations in support of the CEC's efforts to update the Energy Code with new or updated requirements for various technologies. The three California Investor-Owned Utilities (IOUs) — Pacific Gas and Electric Company, San Diego Gas and Electric, and Southern California Edison — and two Publicly Owned Utilities — Los Angeles Department of Water and Power and Sacramento Municipal Utility District — supported this effort. The program goal is to submit proposals that result in cost-effective enhancements to improve energy efficiency, energy performance, and GHG emissions reductions in California buildings.

CI Team subject matter experts work closely with the CASE proposal authors to address compliance and enforcement goals. The CI Team's goal is to reduce roadblocks for industry professionals in the compliance supply chain with a focus on bridging the gaps between the development and implementation of Title 24, Part 6.

Comments on the August 2024 Express Terms

We have reviewed the August 2024 Express Terms (Part 6 with Reference Appendices and Part 1, Chapter 10) and appreciate that many of the code change proposals that we have worked with the CEC and other stakeholders to develop over the last few years are incorporated into the draft language. We offer the following three comments:

1. **Support updated requirements the nonresidential multi-zone heat pump baseline (Section 140.4(a)3).** We acknowledge and commend CEC for the

significant efforts made to revise requirements in this section between the release of the 45-day language (March 2024) and the August 2024 Express Terms to arrive at requirements that are acceptable to stakeholders. We support measures where the long-term benefits to buildings and the electric grid outweigh the initial costs to comply. The Statewide CASE Team is committed to providing assistance to CEC on this measure, if requested. As the multizone heat pump market continues to evolve, we are also available to support efforts to add more system types to the prescriptive approach through the 10-109 Executive Director approval process for the 2025 code to add system types for the 2028 code cycle.

2. **Support revisions to definitions regarding Advanced Water Heater Specifications (AWHS) in Section 100.1 and the reference to AWHS in Joint Appendix 13.** The updated definition references the latest advanced water heater specification published by the Northwest Energy Efficiency Alliance (NEEA) with an effective date of July 15, 2024. The revision enables Title 24, Part 6 to leverage the latest industry knowledge and reduces the burden on manufacturers to meet two different versions of the AWHS.

3. **Eliminate confusion between “habitable” and “occupiable” space.** Both the California Building Code (Title 24, Part 2) and the California Building Energy Efficiency Standards (Title 24, Part 6) distinguish between “habitable” and “occupiable” space. Broadly speaking, “habitable space” is space for living, sleeping, eating, or cooking, and does not include toilet rooms, hallways, or storage areas. “Occupiable space” encompasses all of “habitable space” as well as the accessory areas that support human occupancy, and includes provisions for exiting, lighting, ventilation and other code requirements for health and safety.

We do not expect that this clarification can be made throughout the code for this cycle. For the next code cycle, we will try to verify the correct use of these terms in other locations throughout the code and recommend clarifications as appropriate. In the spirit of improving clarity and consistency in the August 2024 Express Terms, we recommend the following modification to Section 140.4(a)3, Exception 1:

- a. “Buildings greater than 150,000 square feet or greater than 5 **habitable occupiable** stories.”

Conclusion

Thank you for considering these comments and for the constructive dialogue that went into developing and updating the 2025 Building Energy Efficiency Standards. Our team is available to assist CEC staff in resolving concerns or outstanding issues.