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**ASHRAE Letter - 24-BSTD-01 2025 Energy Code**

*Additional submitted attachment is included below.*



Shaping Tomorrow's  
Built Environment Today

M. Dennis Knight  
2024-2025 ASHRAE President

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September 3, 2024

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

Letter sent via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Re: Docket 24-BSTD-01: 2025 Energy Code

Dear Chair Hochschild:

ASHRAE, founded in 1894, is a technical and professional society of more than 53,000 members, including over 3,000 in California, that focuses on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

We appreciate the opportunity to comment on the updated August 15-day language for the 2025 Energy Code Rulemaking. ASHRAE's previous letter regarding this rulemaking, dated May 10, 2024, requested that Section 140.4(a)3, "Prescriptive Requirements for Space Conditioning Systems," be revised to remove the proposed constraints on HVAC system designs and technology options, and instead recommended an approach based on setting metrics and minimum standards for performance.

However, the most recent updates to Section 140.4(a)3 in the 15-day language are still not sufficiently clear regarding the full costs associated with the required systems, as well as the potential safety issues with the new A2L refrigerants required in VRF systems in particular. **Since the issues identified in our May letter have not been fully resolved by this latest update, ASHRAE now requests that the CEC remove this section containing the prescriptive requirements from the current rulemaking proposal, until a complete cost analysis of the proposed prescriptive system options is available.**

Additionally, we emphasize that ASHRAE's members and subject matter experts stand ready to assist the CEC with the analysis and technical expertise needed to find a solution to these issues. ASHRAE's California chapter members, as well as committee members and other volunteers,

are willing to participate in meetings and discussions, document review, or any aspects of this process that could benefit from their objective and nonpartisan technical perspective.

Please do not hesitate to contact [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org) with any specific questions. Thank you for your work to improve building performance and improve the lives of California residents.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is written in a cursive style with a blue ink color.

M. Dennis Knight  
2024-2025 ASHRAE President