

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS**

2020 W. El Camino Avenue, Suite 200, Sacramento, CA 95833
P.O. Box 1407, Sacramento, CA 95812-1407
(916) 445-9471 / FAX (916) 263-5348
From TDD Phones 1-800-735-2929
www.hcd.ca.gov



June 9, 2015

VIA email transmission: Docket@energy.ca.gov

California Energy Commission

Re: **Docket No. 15-BSTD-01**

Adoption of 15-Day Language for the
2016 Building Energy Efficiency Standards (CALGreen, Part 11)
1516 Ninth Street
Sacramento, CA 95814

California Energy Commission:

The Department of Housing and Community Development's State Housing Law (SHL) Program, in part, oversees the application of state laws, regulations, and code enforcement by local jurisdictions, including fire departments and fire districts. The SHL also develops statewide building standards for residential construction. The SHL Program has reviewed the Energy Commission's proposed revisions to the California Green Building Standards Code (CALGreen) and has the following comments:

A4.203.1.2.3 Zero Net Energy Design Tier.

The proposal for this tier, formerly designated as Tier 3, does not fit the format of CALGreen which provides for mandatory requirements and voluntary "enhanced" Tier 1 and Tier 2 levels. The current format of CALGreen, in addition to providing for enhanced levels of green building compliance, provides for use of elective measures. For example, the ZNE "tier" could be designated as an elective measure instead of a "third level" Tier or be a component of Tier 2.

This section also requires that the Zero Net Energy building comply with Tier 2 requirements in Section A4.203.1.2.2. Section A4.203.1.2.2 includes two methods for compliance with Tier 2. One method, assumed to apply to the ZNE building, includes calculation of the Energy Design Rating. Clarification should be provided on whether the Energy Design Rating for the ZNE building would exclude on-site generation as specified for the Tier 2 building.

Performance Standards A4.203.1.2/A4.204.1 and A5.203.1.2.1/A5.203.1.2.2

There is a difference in terminology between the low-rise residential sections referencing "Standard Design Building" and the nonresidential (high-rise residential and hotels/motels included) referencing "Proposed Design Building." It is not clear whether "Proposed Design Building" is used in the nonresidential section to accommodate actual (versus "standard")

California Energy Commission

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California Energy Commission

Docket No. 15-CALG-01

June 9, 2015

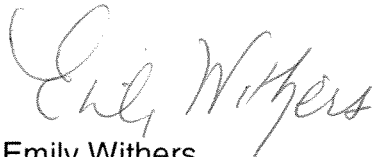
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lighting power for the high-rise residential and hotel/motel buildings. The reference to "Proposed Design Building" is similarly shown in Section A5.602 Nonresidential Occupancies Application Checklist.

We thank the Energy Commission for the opportunity to comment on the proposed changes to CALGreen. If you have any questions on our comments, please feel free to contact the SHL Program:

Kyle Krause, Codes & Standards Administrator I	(916) 263-4719
Emily Withers, Codes & Standards Administrator II	(916) 263-2998

Sincerely,



Emily Withers
Codes and Standards Administrator II
State Housing Law Program
Department of Housing and Community Development