



**CITY/COUNTY ASSOCIATION OF GOVERNMENTS
OF SAN MATEO COUNTY**

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California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Dockets Office, MS-4

California Energy Commission

DOCKETED

15-BSTD-01

TN # 759H

JUN F€ 2015

Re: Docket No. 15-BSTD-01 Adoption of 15-Day Language for the 2016 Building Energy Efficiency Standards
June 9, 2015

Dear California Energy Commission,

Comments Supporting Adoption of Title 24 2016 15-Day Language:

The San Mateo County Energy Watch (SMCEW) is a local government partnership between City/County Association of Governments of San Mateo County and Pacific Gas and Electric Company. We partner with Ecology Action to administer our turnkey lighting retrofit program for local governments, special districts, small businesses, non-profits, schools, farms, and lower income residents.

For the past year, SMCEW has had to significantly reduce our efforts to market to certain sub-segments within the small business sector because of the negative impact of the Title 24 code changes last July. For example, PG&E data indicates that offices and real estate have the highest opportunity for savings in San Mateo County, yet since lighting retrofit projects in office buildings tend to trigger code, the projects aren't cost effective. Instead, we have limited our outreach to non-code-triggering sub-sectors such as warehouses, small retail, gas stations, convenience stores and restaurants. With the new Code requirements, we have found it to be much more difficult to find business owners willing to move forward with retrofits because the projects don't make financial sense for them.

Ecology Action's research on the impact of Title 24 Code includes projects and proposed projects from San Mateo County. The collection of projects shows concretely the severe consequences imposed by the 2013 code, especially as it impacts the small business sector. We feel that the 15-Day Language represents an acceptable compromise, and would like to see it implemented as soon as possible after it is adopted rather than waiting until January 1, 2017.

Thank you for your consideration.

Best regards,

Sandy Wong
Executive Director