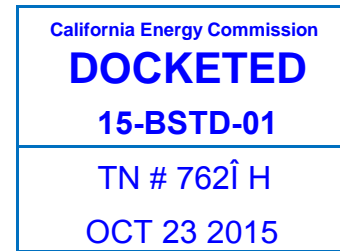




**CITY/COUNTY ASSOCIATION OF GOVERNMENTS
OF SAN MATEO COUNTY**

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California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512



Re: Docket No. 15-BSTD-01 Adoption of 15-Day Language for the 2016 Building Energy Efficiency Standards
October 23, 2015

Dear California Energy Commission,

I'm writing to urge you to include an item about the 2016 update to Title 24 Code on the November 12 California Energy Commission agenda. Because of CEC's procedural timeline, an up or down decision on this matter is needed so Code can be adjusted for 2016, and not wait until 2020.

This item is important to the City/County Association of Governments of San Mateo County (C/CAG) because C/CAG partners with Pacific Gas and Electric Company (PG&E) to offer energy efficiency services to local governments, special districts, small businesses, non-profits, schools, farms, and lower income residents in our county through the San Mateo County Energy Watch (SMCEW) program. Our turnkey lighting retrofit program has been negatively impacted by the July 2014 Title 24 code changes.

With the new Code requirements, we have found it to be much more difficult to find decision makers with office buildings and real estate properties willing to move forward with retrofits because the projects don't make financial sense for them. (Lighting retrofit projects in these business sub-sectors now trigger code, so they aren't as cost effective.) Consequently, SMCEW has limited outreach to non-code-triggering sub-sectors such as warehouses, small retail, gas stations, convenience stores and restaurants.

The current Code requirements are not only detrimental to our program's success – since PG&E data indicates that offices and real estate have the highest opportunity for savings in San Mateo County – it significantly hampers overall energy reduction efforts throughout the region.

We were pleased to hear that the CEC is considering adjustments to Title 24 Code that are an acceptable compromise to various stakeholders. We were concerned, however, that the topic was pulled from the August 12 and October 14 CEC agendas without explanation. We respectfully request you to put this topic on your November 12 agenda and adopt the proposed 2016 15-Day Language at that business meeting.

Thank you for your consideration.

Best regards,

Sandy Wong
Executive Director