

## **BEFORE THE CALIFORNIA ENERGY COMMISSION**

2016 Buildings Energy Efficiency Standards

Docket # 2014-BSTD-01

**COMMENTS OF THE  
LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION  
ON  
2016 BUILDING ENERGY EFFICIENCY STANDARDS**

JODY S. LONDON  
Jody London Consulting  
P.O. Box 3629  
Oakland, California 94609  
Telephone: (510) 459-0667  
E-mail: [jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

**For THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION**

November 24, 2014

The Local Government Sustainable Energy Coalition<sup>1</sup> (“LGSEC”) is pleased to provide these brief comments on the California Energy Commission’s (“CEC”) revisions to Title 24 building standards. The LGSEC limits its comments to higher level policy issues. We realize that this proceeding is focused on the promulgation of new codes. It is important for the CEC to consider the policy context and on-the-ground conditions in which these new codes are released. We therefore offer brief recommendations.

**1. Anticipate a success metric that is based on reduction of greenhouse gas emissions.** It is increasingly clear that California must move more quickly to reduce greenhouse gas emissions from the built environment. Under the current energy efficiency regime, a lot of money is spent measuring reductions in energy usage on a widget-by-widget basis. This is not yielding the dramatic changes we need to see at this point to adapt to climate change, let alone stop it. Increasingly we see from the Administration of Governor Brown a focus on broad climate change goals. The CEC’s sister agency, the California Public Utilities Commission, has recently launched a proceeding on Integrated Demand Side Management (R.14-10-003), in which intends to cohesively consider and evaluate a range of demand side strategies. The CEC should use the opportunity in the 2016 Title 24 revisions to consider how these code updates can be used for a broader purpose.

**2. Consider baseline.** As local governments ever more aggressively work with our communities to meet our locally adopted climate action goals and policies, we find that the gap between current building conditions and Title 24 is becoming a chasm that some building owners cannot cross. We understand that the CEC is considering existing buildings in its

---

<sup>1</sup> The LGSEC is a statewide membership organization of cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC’s Board. A list of our members can be found at [www.lgsec.org](http://www.lgsec.org).

proceedings to implement AB 758. And yet the specter of a yet-more-stringent Title 24 coming into effect in a relatively short period of time must be recognized here.

The CEC should discuss in its decision documents in this proceeding the importance of bringing existing buildings up to code. The CEC should direct the municipal utilities under its jurisdiction to provide incentives that allow building owners to make progress over time (perhaps using financing) to improve existing building stock so those buildings can one day achieve whatever is the Title 24 code in effect. And the CEC should work with the CPUC, who has jurisdiction over the investor-owned utilities, and the Legislature to build awareness of this conundrum and encourage those entities to take action aligned with direction the CEC should provide to municipal utilities.

Respectfully submitted,



Jody S. London

For THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION  
P.O. Box 3629  
Oakland, CA 94609

November 24, 2014