

PACIFIC GAS AND ELECTRIC COMPANY
Energy Efficiency 2018-2025 Rolling Portfolio Business Plan
Application 17-01-015
Data Response

PG&E Data Request No.:	CCEE_001-Q29		
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Request Date:	March 22, 2017	Requester DR No.:	001
Date Sent:	April 7, 2017	Requesting Party:	California Coalition for Energy Efficiency
		Requester:	Thomas A. Enslow

SUBJECT: APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U338E) FOR APPROVAL OF ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED MATTERS. CCE-DR01

QUESTION 29

What is meant by the compliance strategy to “simplify” the codes?¹²

- (a) What code requirements have been identified as too complex or amenable to simplification without reducing safety or energy efficiency?
- (b) Please provide any data, reports, studies or other evidentiary basis to support the assumption that simplifying the codes will increase code compliance?

Answer 29a) Compliance Improvement subprogram staff are in constant contact with builders and code enforcement officials. These stakeholders have expressed interest in simplifying California codes to allow for more cost efficient building construction and alterations, as well as more straightforward review by local building officials.

b) For example, input on the non-residential HVAC and lighting alterations¹³ sections of Title 24, Part 6 was collected through focus groups.¹⁴ Multiple white papers published by a stakeholder insight group, the Compliance Improvement Advisory Group,¹⁵ advocate for simplification and a reduction in process-related burdens in the compliance process.¹⁶ Revisions to the standards that reduce complexity as well as streamline the compliance process are expected to increase compliance, thereby increasing statewide energy savings. Codes & Standards program impact evaluation efforts are expected to determine if any implemented code simplifications increase energy savings.

¹² PG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Codes & Standards at p. 21.

¹³ 2016 Building and Appliance Efficiency Standards, Section 141.0 and S150.2.

¹⁴ http://title24stakeholders.com/wp-content/uploads/2017/03/Simplify-the-Code-Needs-FINAL-2_10_2017.pdf

¹⁵ <http://www.caciag.com>

¹⁶ In particular, see Paper #14: Simplifying the Code, <http://www.caciag.com/Issues>