



Shaping Tomorrow's Global Built Environment Today

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August 20, 2026

David Hochschild
Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket 24-BPS-01, Draft Building Energy Performance Strategy Report

Sent via email to: docket@energy.ca.gov

Dear Chair Hochschild:

ASHRAE, founded in 1894, is a technical and professional society of more than 55,000 members, including over 3,000 in California, that focuses on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

ASHRAE is pleased to submit comments on the California Energy Commission's (CEC's) Building Energy Performance Strategy Report, issued July 2026. The report states that an effective Building Performance Standard (BPS) would apply to commercial and residential buildings greater than 50,000 square feet that are subject to California's existing Building Energy Benchmarking Program. **We appreciate that the report also recommends that "ASHRAE Standard 100 . . . can serve as a strong starting point for a formal regulatory proceeding to enact a statewide BPS."**

The most significant opportunity to reduce energy consumption and carbon emissions in the built environment is through existing buildings. Currently, the United States has 5.9 million commercial buildings and 124 million residential buildings, which together account for approximately 40% of the nation's total energy use, 70% of its electricity consumption, and 40% of its carbon dioxide emissions. Existing buildings account for approximately 75% to 80% of buildings that will exist in 2030, and at least 50% of all buildings that will exist in 2050. New buildings become existing buildings as soon as they are occupied. Jurisdictions serious about reducing their carbon footprint need a building performance standard that helps them reduce

energy consumption and carbon emissions in their existing buildings where such improvements are practicable. ANSI/ASHRAE/IES Standard 100-2024, *Energy and Emissions Building Performance Standard for Existing Buildings*, is that standard. It provides processes and procedures for reducing energy consumption and carbon emissions through improved energy efficiency and performance of all types of existing buildings, including residential, commercial, institutional, and industrial.

According to California's Building Energy Performance Strategy Report, the following are some of the most critical components of an effective BPS:

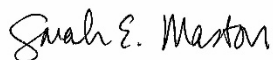
- “Encourage, or authorize, local jurisdictions to implement their own BPS policies, if those programs apply to buildings not covered by the state program, but apply a single statewide standard to all large buildings.”
 - Standard 100 provides owners, utility companies, and government at every level a verifiable process that can reduce energy costs and support tax incentives, rebates, and related programs. It also includes tables to help a jurisdiction determine its Energy Use Intensity (EUI) targets.
- “Include mandatory compliance periods of five years and establish final performance targets in 2045 for each property type. All buildings subject to the BPS should have the same compliance deadlines, except for buildings with unique considerations that may be approved for alternate deadlines.”
 - Standard 100 has the flexibility to allow each jurisdiction to determine its own compliance cycle timelines and compliance deadlines.
- “Include two primary building performance metrics: the energy used by the building and the greenhouse gas emissions emitted directly from the building.”
 - Standard 100 includes requirements to meet two performance metrics, energy used by the building and GHG emissions associated with energy used at the building. These metrics can easily be adapted to meet California's goals.
- “Include performance baselines for each building based on several years of benchmarking data. Availability of benchmarking data can inform how baseline years are set for buildings subject to the BPS.”
 - Standard 100 offers national baselines for jurisdictions to use, but recommends the use of locally derived baselines. The standard also provides guidance for jurisdictions on how to derive local baselines.
- “Require new energy benchmarking data verification to support fair implementation of a statewide BPS. Data verification could be performed by a licensed professional at a cadence that aligns with key BPS evaluation years, such as the interim and final performance years.”
 - Two additional ASHRAE Standards, Standard 180-2018 and Standard 211-2023, can assist in implementing data verification requirements for a BEPS:

- ANSI/ASHRAE/Air Conditioning Contractors of America (ACCA) Standard 180-2018, *Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems*, establishes minimum HVAC inspection and maintenance requirements that preserve a system’s ability to achieve acceptable thermal comfort, energy efficiency, and indoor air quality in new and existing commercial buildings.
- ANSI/ASHRAE/ACCA Standard 211-2018 (reaffirmed 2023), *Standard for Commercial Building Energy Audits*, establishes consistent practices for conducting and reporting energy audits for commercial buildings.
- “Provide building owners with compliance pathways that allow flexibility to account for capital planning cycles, building life cycles, and leasing cycles, which will be different for each building. These pathways may include, but are not limited to, standard target adjustments, portfolio-level compliance, timeline adjustments, and baseline adjustments.”
 - While not incorporated in Standard 100 presently, it is possible through ASHRAE’s consensus process that pathways addressing portfolio-level compliance, capital planning cycles, leasing cycles, and other considerations could be incorporated in a future edition of the standard.

As the Building Energy Performance Strategy Report recommends, ASHRAE strongly supports the adoption of ASHRAE Standard 100-2024 in establishing California’s Building Energy Performance Standards.

We appreciate your consideration of the comments submitted by ASHRAE. Please let us know if ASHRAE can expand on any of the points above or can be of further technical assistance by contacting me, or having your staff reach out to GovAffairs@ashrae.org.

Sincerely,



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