Shaping Tomorrow's Global Built Environment Today

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September 4, 2026

Tulare County Board of Supervisors
2800 W. Burrel Ave
Visalia, VA 93291

Sent via email to: Chief of Staff Israel Sotelo Jr, isotelo@tularecounty.ca.gov

Re: Technical Advice on Data Center Energy Efficiency for Tulare County

Dear Supervisors Micari, Vander Poel, Shuklian, Valero, and Townsend:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating and Air-Conditioning Engineers, regarding Tulare County's recent interim ordinance to establish a 45-day moratorium on data center development in any unincorporated part of the county, and directs the county's Resource Management Agency to "prepare amendments based on development standards, building design, environmental performance standards, and "any additional operational standards determined necessary to protect the… welfare of the public."

ASHRAE is a technical society with expertise in building systems, including data centers. Our technical expertise and standards should be useful to the county's Resource Management Agency in preparing amendments as directed by the ordinance. ASHRAE appreciates that the county's proposal aims to evaluate the impact of data centers before any permanent regulations are established

ASHRAE, founded in 1894, is a global professional and technical society of more than 55,000 members worldwide, including over 3,300 in California. ASHRAE and its members focus on building systems, energy efficiency, indoor air quality, refrigeration, building water systems, sustainability and resilience. Through research, standards development, publishing, certification and continuing education, ASHRAE shapes tomorrow's global built environment today.

One of the ways that ASHRAE contributes to the improvement of the built environment is as a Standards Developing Organization (SDO). Voluntary consensus technical standards are developed through the participation of qualified, interested, and affected stakeholders including manufacturers,

consumers, users, advocacy organizations, and representatives of government and academia. ASHRAE is one of seven private standards development organizations in the U.S. that can self-certify that its standards have followed procedures established by the American National Standards Institute (ANSI), which include requirements concerning transparency, balanced representation, due process, consensus, and technical expertise. The standards ASHRAE develops are often adopted into state and local building codes and provide the scientific bedrock that legislation and regulations are built on.

An ASHRAE resource we wish to bring to your attention is ANSI/ASHRAE Standard 90.4-2025, *Energy Standard for Data Centers* (Standard 90.4). This standard establishes minimum energy-efficiency requirements for the design, construction, and planned operation and maintenance of data centers. Standard 90.4 is a data-center-specific, performance-based framework, evaluating the efficiency of the mechanical and electrical infrastructure as an integrated system rather than prescribing individual equipment requirements. Its Mechanical Load Component (MLC) measures the total cooling and heat-rejection power relative to the information technology load, while its Electrical Loss Component (ELC) measures losses across the electrical distribution path. Compliance with the standard is based on meeting combined performance targets, designers can balance or tradeoff between MLC and ELC, optimizing one to accommodate the other, providing for a flexible, outcome-driven standard tailored to mission-critical facilities.

Standard 90.4 is a widely recognized energy-efficiency standard for data centers, with growing adoption across model codes, building certification programs, and state-level regulations. Its performance-based framework for electrical and mechanical infrastructure efficiency is now embedded in multiple authoritative pathways, including sections that are included in IECC, ASHRAE Standard 90.1 and incorporation into commercial energy codes in the states of Washington and Oregon.

California's 2025 Energy Code already contains significant energy-efficiency requirements for computer rooms. Among other provisions, it regulates economizers, fan power and controls, air containment, humidification, and uninterruptible power supply efficiency. California's energy code does not, however, adopt or reference Standard 90.4, and its requirements are not a complete functional equivalent of the standard.

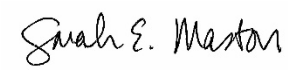
ASHRAE therefore encourages Tulare County to evaluate a local adoption of ASHRAE Standard 90.4 that would operate *in addition* to California's energy code. Standard 90.4 complements California's energy code by providing the specialized, performance-based mechanical and electrical efficiency requirements needed for mission-critical data centers, which are requirements not fully addressed in the general statewide code. Its adoption would ensure Tulare County applies a nationally recognized, code-aligned standard that strengthens grid reliability, supports high-density computing growth, and maintains consistency with IECC and ASHRAE Standard 90.1.

Standard 90.4 does not cap a data center's total electricity demand or regulate the energy consumed by its information technology equipment. It does, however, provide greater regulatory assurance that the mechanical and electrical infrastructure serving that load meets recognized minimum whole-system efficiency criteria. Fundamentally, this would add another additional, data center specific, compliance framework to ensure minimum levels of energy efficiency on top of existing regulations.

I would also like to call your attention to several additional technical resources developed by ASHRAE that provide guidance to data center engineers, users, and operators, including our AI Data Center Framework, Data Center Resource Page, and the ASHRAE TC 9.9 Datacom Series. ASHRAE members and non-members have relied on these resources to support the design and operation of high-efficiency, reliable, and resilient mission-critical data centers. We stand ready to work with Tulare County to provide technical guidance and assistance as it develops regulations for data center development that promotes energy efficiency, reliability, resilience, and responsible growth.

Thank you for your consideration of our comments. If it would be helpful, we would be happy to provide complimentary copies of Standard 90.4 if you are considering incorporating it into your county regulation. Standard 90.4 can also be accessed for free on our website. Additionally, ASHRAE's subject matter experts would be happy to offer consultation and advice to you on this issue, and on any issue impacting the built environment. Please contact GovAffairs@ashrae.org, with any questions or requests for additional information and resources.

Sincerely,



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