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Instructions: **Please make comments specific**, reference pages where appropriate, and be focused on **Business Plan level strategies**.

**CodeCycle Comments: Non-IOU PA Business Plans**
Comment #	**PA(s)**	**Sector**	**Page #**	**Comment**
CodeCycle-1	Non-IOU PAs (RENs and CCAs)	*C&S*	General	**Observations** • *The IOUs have stated that they are unwilling to engage in Title 24 enforcement assistance that provides direct, actionable information to building officials. At the same time, building officials need – more than anything – building-specific guidance on how to enforce Title 24. This creates a critical and ever growing gap between the type of assistance most needed by buiding officials and what the IOU compliance improvement programs are willing to provide.* • *In Decision 16-08-019, there was a directive for PAs to establish statewide programs for certain portfolio subprograms. The language states, in part, "These subprograms include, but are not necessarily limited to: . . ."This language leaves open the possibility that other subprograms could be administered on a statewide basis if PAs were interested in doing so. (Decision Section 4.9.2)* **Recommended Action** • ***We would like to see one or more of the government-driven Program Administrators – the RENs and CCAs – offer a Title 24 compliance improvement program on a statewide basis. There are already cities in California that would like to use advanced Title 24 enforcement assistance tools but which are not currently covered by the REN and CCA service territories (e.g. coastal California and the Central Valley).***
CodeCycle-2	BayREN	*C&S*	Pg. 1.9	**Observations** • *We are encouraged to see that BayREN will continue to support the deployment of digital tools that can provide direct assistance to building officials. This is one of the biggest gaps in the current enforcement assistance portfolio statewide. By supporting such programs, BayREN will also be bringing forward more robust data on current compliance practices data that will be invaluable to policy planners at both the state and local level.* **Recommended Action** *No recommended action.*
CodeCycle-3		*C&S*	General	**Observations** • *The State's existing compliance improvement programs have been evaluated, almost*

	Non-IOU PAs (RENs and CCAs)			*exclusively, on outputs rather than outcomes (as the respective metrics have been defined within CAEECC). The primary metric for compliance improvement has been the number of trainings provided rather than kWh or therms saved.* ## Recommended Action • ***If the State is to optimize the value to ratepayers from its compliance improvement investment, PAs interested in supporting advanced compliance assistance tools should look to measure energy outcomes, allowing the CPUC to make more informed decisions on what Title 24 compliance improvement solutions should be supported by ratepayers and which should not. By extension, the BP chapters discussing compliance improvement should identify at least some compliance improvement programs as likely to become resource programs in the coming years.***

Commenter—please replace red text with the information you wish to provide. Please submit completed comments to **facilitator@caeecc.org**