

Addendum

It has come to the attention of the CPUC, through comments received after the public comment period, that there are methodological differences between 1) the Title 24 compliance portion of 2010-2012 Impact Evaluation (one of several parts of an evaluation used to quantify energy savings attributable to IOUs' involvement in changing the Title 24 codes) and 2) the requirements set forth by the California Energy Commission for assessing compliance with the energy code. The CPUC believes that the compliance modeling methodologies used in the Impact Evaluation are valid for the CPUC's intended purpose. Nonetheless, the CPUC thinks it prudent to note the methodological differences so that the results of the 2010-2012 Impact Evaluation will not be misinterpreted as a barrier to further improvements in compliance.

By way of example, the CPUC's evaluation assigned Power Adjustment Factors (PAFs) to lighting controls in a manner that is different than what is required for a design team complying with Title 24. The precise scale of the delta between the two modeling methodologies has not been assessed by the CPUC.

Further, because mandatory measures did not change between the 2005 code and the 2008 code, mandatory measures were not a focus area for the 2010-2012 Impact Evaluation. Consequently, the 2010-2012 Impact Evaluation did not assess compliance with a wide range of mandatory measures.

For these reasons, the 2010-2012 impact evaluation should not be used as a reference point in assessing the potential energy savings that can come from Title 24 compliance improvement efforts for mandatory measures.