



**California Energy Commission
October 8, 2025 Business Meeting
Backup Materials for Updated Alternative Calculation Method Reference Manuals
for the 2025 Energy Code**

The following backup materials for the above-referenced agenda item are available as described below:

1. Proposed Resolution, attached below.
2. CEQA Memo, attached below.
3. Updated 2025 Single-family Alternative Calculation Method Reference Manual
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-BSTD-03>.
4. Updated 2025 Nonresidential and Multifamily Alternative Calculation Method Reference Manual
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-BSTD-03>.

For the complete record, please visit:

<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-BSTD-03>.

STATE OF CALIFORNIA

**STATE ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

IN THE MATTER OF:

***2025 Building Energy Efficiency Standards,
California Code of Regulations, Title 24,
Parts 1 and 6***

Docket No. 24-BTSD-03

**RESOLUTION CERTIFYING THE UPDATED ALTERNATIVE CALCULATION
METHOD REFERENCE MANUALS FOR THE 2025 BUILDING ENERGY
EFFICIENCY STANDARDS**

WHEREAS, the 2025 Building Energy Efficiency Standards (2025 Energy Code), amending California Code of Regulations, Title 24, Parts 1 and 6, were adopted by the California Energy Commission (CEC) on September 11, 2024, with an effective date of January 1, 2026, and

WHEREAS, these standards were approved by the California Building Standards Commission (CBSC) on December 17, 2024; and

WHEREAS, the Warren-Alquist Act, in Public Resources Code section 25402.1(e), requires the CEC to certify “an energy conservation manual for use by designers, builders and contractors of residential and nonresidential buildings” no later than 180 days after CBSC approves the Energy Code; and

WHEREAS, in order to implement the requirement of section 25402.1(e), CEC staff has developed an energy conservation manual (ECM) that is comprised of several documents, including residential and nonresidential compliance manuals, residential and nonresidential alternative compliance method reference manuals, a data registry requirements manual, and other compliance forms, all of which contain information to assist designers, builders, and contractors in meeting the 2025 Energy Code, including forms, charts, and other data; and

WHEREAS, the 2025 Energy Code that was adopted by the CEC and approved by the CBSC, specifies, among other things, the requirement to update the Alternative Calculation Method Reference Manuals, which are part of the ECM; and

WHEREAS, CEC staff developed updated content for the Single-family Alternative Calculation Reference Manual, Publication Number CEC-400-2025-006-REV and the Nonresidential and Multifamily Alternative Calculation Reference Manual, Publication Number CEC-400-2025-006-REV (collectively the “ACM Reference Manuals”), which document the modeling methods used in the 2025 compliance software, which demonstrates performance compliance with the 2025 Energy Code; and

WHEREAS, CEC staff has considered the application of the California Environmental Quality Act (CEQA) to the updates made in the ACM Reference Manuals and find that the updates do not meet the definition of a “project” under Cal. Code Regs., Title 14, section 15061(a), because the updates in the ACM Reference Manuals have no potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment, and even if the updated ACM Reference Manuals were to be considered a project, then the project would fall under the “common sense exemption” in California Code of Regulations, title 14, section 15061(b)(3) because it can be seen with certainty that there is no possibility the updated ACM Reference Manuals would have a significant effect on the environment; and

WHEREAS, the CEC has considered staff’s proposed updates to the ACM Reference Manuals and finding that its adoption is exempt from CEQA; and

THEREFORE, BE IT RESOLVED, that on the basis of the entire record before it, the CEC hereby adopts staff’s finding that the updates made in the ACM Reference Manuals are not subject to CEQA because it does not meet the definition of a “project” as it is not an activity that has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and even if it was a project, it is exempt from CEQA pursuant to the Common-Sense Exemption (Cal. Code Regs., tit 14, 15061(b)(3)) because it can be seen with certainty that there is no possibility that the activity will have a significant effect on the environment; and

THEREFORE, BE IT RESOLVED, that the California Energy Commission hereby certifies the updated Single-Family Alternative Calculation Method Reference Manual, Publication Number CEC-400-2025-006-REV, used to support compliance with the 2025 Energy Code; and

FURTHER BE IT RESOLVED, that the California Energy Commission hereby certifies the updated Nonresidential and Multifamily Alternative Calculation Method Reference Manual, Publication Number CEC-400-2025-007-REV, used to support compliance with the 2025 Energy Code; and

FURTHER BE IT RESOLVED, that the California Energy Commission directs the Executive Director or their designee to take all actions reasonably necessary to make the above-referenced documents available and in good form, including but not limited to correcting typographical and other non-substantive errors.

CERTIFICATION

The undersigned Secretariat to the CEC does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the CEC held on October 8, 2025.

AYE:

NAY:

ABSENT:

ABSTAIN:

Dated:

Kim Todd ,
Secretariat

Memorandum

To: Docket 24-BTSD-03

Date: **October 8, 2025**

From: **Will Vicent, Deputy Director**
Efficiency Division
California Energy Commission

Subject: *Basis for Finding that the updates made in the Alternative Calculation Method (ACM) Reference Manuals are not a project and are exempt from the California Environmental Quality Act under the Common-Sense Exemption.*

I. CEQA

The California Environmental Quality Act (CEQA) (Pub. Resources Code, sections 21000 *et seq.*; see also CEQA Guidelines, Cal. Code Regs. (CCR), tit. 14, sections 15000 *et seq.*) requires that state agencies consider the environmental impact of their discretionary decisions. CEQA allows for certain projects to be exempted from its requirements. Of relevance here, and discussed further below, is the common-sense exemption (14 CCR section 15061(b)(3)).

II. The Energy Conservation Manual (ECM) [Pub. Resources Code, section 25402.1(e)]

Public Resources Code Section 25402 requires the CEC to adopt building design and construction standards that increase the efficiency in the use of energy and water for new residential and new nonresidential buildings, and energy and water conservation design standards. The standards are contained in Part 6 and associated administrative regulations in Part 1 of Title 24 of the California Code of Regulations (Energy Code).

No later than 180 days after approval of the Energy Code by the California State Building Standards Commission, the CEC must certify an energy conservation manual for use by designers, builders, and contractors of residential and nonresidential buildings. (Pub. Resources Code, section 25402.1(e).) The manual shall contain, but not be limited to, the following: (1) The standards for energy conservation established by the commission, (2) forms, charts, tables, and other data to assist designers and builders in meeting the standards, (3) design suggestions for meeting or exceeding the standards, (4) any other information which the commission finds will assist persons in conforming to the standards, (5) instructions for use of the computer program for calculating energy consumption in residential and nonresidential buildings, (6) the prescriptive method for use as an alternative to the computer program.

III. The Proposed Action

On September 11, 2024, the CEC adopted amendments to its Building Energy Efficiency Standards, located in Part 1, Chapter 10, and Part 6 of Title 24 of the California Code of Regulations (2025 Energy Code), as authorized and directed by Public Resources Code 25402. On December 17, 2024, the California Building Standards Commission approved the 2025 Energy Code. The 2025 Energy Code will go into effect on January 1, 2026.

On September 11, 2024, the CEC adopted the Initial Study and Negative Declaration for the Energy Code. The CEC considered air emissions, water savings at California power plants, indoor air pollution, and increased materials use associated with the 2025 Energy Code. The Negative Declaration concluded that the potential environmental impacts associated with implementing the 2025 Energy Code were less than significant without need for mitigation. Thus, the Negative Declaration proposes no mitigation measures.

To implement the requirement of section 25402.1(e), on June 11, 2025, the CEC adopted an Energy Conservation Manual (ECM) that is comprised of several documents, including Alternative Calculation Method Reference Manuals, Compliance Manuals, a Data Registry Requirements Manual, and other Compliance Documents, all of which contain information to assist designers, builders, and contractors in meeting the 2025 Energy Code, including forms, charts, and other data. The ACM Reference Manuals are being updated to clarify modeling descriptions for compliance software. The CEC is considering certifying an updated version of the ACM Reference Manuals at the October 8, 2025, CEC Business Meeting.

IV. The updated ACM Reference Manuals are not a project.

CEQA only applies to an action “that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” (14 CCR section 15061(a).)

As discussed above, the CEC certifies and updates an energy conservation manual to assist interested persons with demonstrating compliance with the Energy Code, pursuant to Public Resources Code, section 25402.1(e). The updates made in the ACM Reference Manuals, as part of the ECM, provide information and guidance for 2025 Energy Code compliance software. The updates made in the ACM Reference Manuals do not impose any new requirements and, therefore, have no potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Accordingly, the updated ACM Reference Manuals do not meet the definition of a project under CEQA.

V. If the updated ACM Reference Manuals were considered a project, it is exempt from CEQA under the Common-Sense Exemption.

The ACM Reference Manuals are exempt from CEQA under the Common-Sense Exemption. As stated above, CEQA only applies to projects that have the potential to cause a significant effect on the environment. “Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (14 CCR section 15061(b)(3).) A “significant effect on the environment” is defined as a “substantial, or a potentially substantial, adverse change” in the environment, and does not include an economic change by itself. (Pub. Resources Code, section 21068; 14 CCR section 15382.)

The ACM Reference Manuals, as part of the ECM, are reference guides designed to help develop compliance software . that reiterates the regulatory language already contained in the 2025 Energy Code. The ACM Reference Manuals contain no new requirements to comply with the 2025 Energy Code. As such, it can be seen with certainty that there is no possibility that the updated ACM Reference Manuals may have a significant effect on the environment, thus making it subject to the common sense exemption in 14 CCR section 15061(b)(3).

VI. Conclusion

As shown above, it can be seen with reasonable certainty that the proposed updates to the ACM Reference Manuals are not a project because they do not impose any new requirements and, therefore, have no potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. If the updated ACM Reference Manuals were to be considered a project subject to CEQA, it can be seen with certainty that the updates made in the ACM Reference Manuals would not have a significant effect on the environment and, therefore, is exempt pursuant to the Common-Sense Exemption under 14 CCR section 15061(b)(3).