



**California Energy Commission  
July 8, 2026 Business Meeting  
Backup Materials for Approval of an Equivalent Alternative Procedures for  
Relocatable Public School Buildings in 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. Recommendation of the Executive Director on Alternative Procedure for Relocatable Public School Buildings in the 2025 Energy Code, attached below.
3. Staff Report, attached below.
4. California Environmental Quality Act (CEQA) analysis, attached below.

For the complete record, please visit: Docket Number 26-BSTD-01 at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>.

To stay informed about this project and receive documents as they are filed, please subscribe to the proceeding Topic, which can be accessed here: [California Natural Resources Agency \(govdelivery.com\)](#) at <https://public.govdelivery.com/accounts/CNRA/signup/31895>. The Topic sends out email notifications and direct links when documents are filed in the proceeding docket.

**CALIFORNIA ENERGY COMMISSION**

**PROPOSED RESOLUTION: APPROVAL OF AN ALTERNATIVE PROCEDURE  
FOR RELOCATABLE PUBLIC SCHOOL BUILDINGS IN THE 2025 ENERGY  
CODE**

**RESOLUTION NO: [YY-MMDD]-XX**

**WHEREAS**, California Public Resources Code Section 25402.1(b) requires the State Energy Resources Conservation and Development Commission, also known as the California Energy Commission (CEC) to, among other things, establish a process for certifying new products, materials, and calculation methods for demonstrating compliance with its building energy efficiency standards; and

**WHEREAS**, California Code of Regulations, Title 24, Part 1, Chapter 10, Section 10-109(h) states, “In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures or protocols that demonstrate compliance with Part 6”; and

**WHEREAS**, California Code of Regulations, Title 24, Part 6 (2025 Energy Code) specifies that a building complies with the performance standards if the energy consumption calculated for the Proposed Design Building is no greater than the energy budget calculated for the Standard Design Building as specified in Section 140.1(a); and

**WHEREAS**, the 2025 Energy Code defines a relocatable public school building as “a relocatable building as defined by Title 24, Part 1, Section 4-314, which is subject to Title 24, Part 1, Chapter 4, Group 1”; and

**WHEREAS**, in accordance with California Education Code Sections 17310 and 81142, on November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code; and

**WHEREAS**, CEC Staff evaluated DSA’s alternative compliance approach for relocatable public school buildings in the 2025 Energy Code. Staff provided their findings and recommendation for approval in the draft staff report titled "[Alternative to the Compliance Procedures for Relocatable Public School Buildings in the 2025 Energy Code](#)" available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=269817&DocumentContentId=106964>.

**WHEREAS**, On May 4<sup>th</sup>, 2026, the CEC provided a copy of the draft staff report to interested persons for an opportunity for public comment. The public notice was posted to [Docket Number 26-BSTD-01](#) at

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=269816&DocumentContentId=106963>; and

**WHEREAS**, On June 9, 2026, the CEC posted an updated public notice extending the comment period from June 1, 2026 to June 11, 2026. The updated public notice was posted to [Docket Number 26-BSTD-01](https://efiling.energy.ca.gov/GetDocument.aspx?tn=270416&DocumentContentId=107677) at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=270416&DocumentContentId=107677>. No comments were received; and

**WHEREAS**, On June 26, 2026, the CEC provided the finalized version of the staff report titled "Alternative to the Compliance Procedures for Relocatable Public School Buildings in the 2025 Energy Code" available at <https://www.energy.ca.gov/proceedings/business-meetings>;

**WHEREAS**, The Executive Director reviewed the staff analysis and, on June 26, 2026, submitted a recommendation to the CEC that they approve the Alternative Procedure for demonstrating compliance of relocatable public school buildings with applicable performance standards of the 2025 Energy Code. and

**WHEREAS**, CEC staff has considered the application of the California Environmental Quality Act (CEQA) to the "Alternative to the Compliance Procedures for Relocatable Public School Buildings in the 2025 Energy Code" and determined that the proposed Alternative Procedure does not meet the definition of a "project" under California Code of Regulations, Title 14, section 15378(a), because the Alternative Procedure has 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 Alternative Procedure was 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 reasonable possibility the Alternative Procedure would have a significant effect on the environment.

**THEREFORE, THE CALIFORNIA ENERGY COMMISSION FINDS:**

1. Approval of this Alternative Procedure is not a project, as defined, subject to the California Environmental Quality Act (CEQA) and, alternatively, if it is a project, it is exempt pursuant to the common-sense exemption under Section 15061(b)(3) of the CEQA Guidelines.
2. The proposed Alternative Procedure for demonstrating compliance with the 2025 Energy Code for relocatable public school buildings is technically feasible and will result in the reduction of energy consumption for these buildings.

3. The proposed Alternative Procedure is approved for demonstrating compliance with the 2025 Energy Code for relocatable public school buildings as defined in the 2025 Energy Code.

**THEREFORE, BE IT RESOLVED**, that the California Energy Commission approves and authorizes the use of the Alternative Procedure for demonstrating compliance of relocatable public school buildings with applicable performance standards within the 2025 Energy Code; and

**FURTHER BE IT RESOLVED**, that documents and other materials relevant to this action can be found at the CEC, 715 P Street, Sacramento, California, 95814 in the custody of the Docket Unit and online in [Docket Number 26-BSTD-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01), <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>; 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.

**APPROVED AND ADOPTED** this 8th day of July 2026, by the following vote:

AYE:

NAY:

ABSENT:

ABSTAIN:

#### **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 approved and adopted by the affirmative vote of the CEC at a meeting held on July 8, 2026.

Kim Todd  
Secretariat



## MEMORANDUM

TO: California Energy Commission

FROM: Drew Bohan  
Executive Director  
California Energy Commission  
715 P Street  
Sacramento, California 95814

SUBJECT: CEC Executive Director Recommendation to Approve an Alternative Procedure for relocatable public school buildings in the 2025 Energy Code

DATE: June 24, 2026

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### BACKGROUND

The 2025 Energy Code regulations contained in the California Code of Regulations (CCR), Title 24, Parts 1 and 6, which became effective January 1, 2026, establish the opportunity, in Section 10-109(h), for the California Energy Commission (CEC) to “In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures or protocols that demonstrate compliance with Part 6.” This action is in alignment with California Public Resources Code Section 25402.1(b) which requires that the CEC establish a process for certifying new products, materials, and calculation methods for demonstrating compliance with the Energy Code.

The 2025 Energy Code defines a relocatable public school building as “a relocatable building as defined by Title 24, Part 1, Section 4-314, which is subject to Title 24, Part 1, Chapter 4, Group 1.” In accordance with California Education Code Sections 17310 and 81142, on November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code.

CEC staff evaluated DSA’s alternative compliance approach for relocatable public school buildings in the 2025 Energy Code. Staff provided their findings and conclusions in the attached staff report titled “Alternative to the Compliance Procedures for Relocatable Public School Buildings in the 2025 Energy Code.” The CEC considered the Alternative Procedure at its July 8, 2026, Business Meeting.

## SEQUENCE OF EVALUATION

- On November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code for relocatable public school buildings.
- On May 4<sup>th</sup>, 2026, pursuant to Title 24, Part 1, Sections 10-109(h) and 10-110, a public notice was posted to docket number [26-BSTD-01](#).<sup>1</sup> The notice provided an opportunity for public comment on a draft staff report titled "[Alternative to the Compliance Procedure for Relocatable Public School Buildings in the 2025 Energy Code](#)," which provided the findings from staff's evaluation of DSA's alternative compliance approach.
- On June 9<sup>th</sup>, 2026, the opportunity for public comment was extended to June 11, 2026. No comments were received.
- Staff found that the proposed alternative procedure for demonstrating compliance with the 2025 Energy Code for relocatable public school buildings is technically feasible and should result in the reduction of energy consumption for these buildings.

## CONCLUSION AND RECOMMENDATION

Pursuant to the 2025 Energy Code, Section 10-109(h), and 10-110 I recommend the CEC approve the Alternative Procedure for demonstrating compliance of relocatable public school buildings with applicable performance standards of the 2025 Energy Code.



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Drew Bohan  
Executive Director  
California Energy Commission

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Date: June 24, 2026

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<sup>1</sup> Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>

California Energy Commission

**STAFF PAPER**

**Alternative to the Compliance  
Procedures for Relocatable  
Public School Buildings in the  
2025 Energy Code**

Trevor Thomas  
Building Standards Branch  
Efficiency Division

**June 2026 | CEC-400-2026-004**

**DISCLAIMER**

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# ABSTRACT

The California Energy Commission (CEC) adopted the 2025 Energy Code (California Code of Regulations, Title 24, Part 1, Chapter 10, and Part 6) on September 11, 2024, with the effective date of January 1, 2026. Section 10-109(h) of the 2025 Energy Code states, “In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures or protocols that demonstrate compliance with Part 6.”

On November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code. The approach allowed building designs analyzed using the performance compliance approach to be evaluated for the four cardinal azimuths and introduced the climate zone group method as an acceptable alternate method of compliance.

In keeping with the CEC mission to maintain accurate and technically feasible compliance procedures, CEC staff proposes an additional alternative procedure to the Nonresidential Appendix NA4 “Compliance Procedures for Relocatable Public School Buildings” specification of the 2025 Energy Code to align with the alternative compliance approach allowed by DSA. Specifically, staff proposes to allow modeling of the energy use of relocatable public school buildings for climate zone groups based on the performance in a representative climate zone and oriented for the cardinal azimuths.

CEC staff has analyzed the proposed alternative procedure for demonstrating compliance and determined that it is technically feasible and effective at reducing the building energy budget to save at least as much energy as currently approved 2025 Energy Code compliance approaches.

This staff report represents CEC staff’s review and recommendation for approval and finalization of the alternative compliance procedure. CEC staff recommend incorporating this alternative procedure in the California Building Energy Code Compliance software (CBECC), which is a CEC-approved software for demonstrating performance compliance with nonresidential provisions of the 2025 Energy Code.

**Keywords:** Climate zone groups, compliance procedure, relocatable public school building, Reference Appendix NA4, California Energy Commission, Building Energy Efficiency Standards, Energy Code, California Building Energy Code Compliance software, Title 24, Part 6

Please use the following citation for this report:

Thomas, Trevor. June 2026. *Alternative to the Compliance Procedures for Relocatable Public School Buildings in the 2025 Energy Code*. California Energy Commission. Publication Number: CEC-400-2026-004.

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# EXECUTIVE SUMMARY

## Key Takeaways:

- The Division of the State Architect (DSA) introduced an alternative approach for demonstrating compliance with California’s 2025 Energy Code for relocatable public school buildings. The approach allows building designs analyzed using the performance compliance approach to evaluate performance for the four cardinal azimuths and introduces the climate zone group method as an acceptable alternate method of compliance.
- CEC staff proposes an additional alternative procedure to the Nonresidential Appendix NA4 specification “Compliance Procedures for Relocatable Public School Buildings” to align with the alternative compliance approach allowed by DSA.
- CEC staff also proposes incorporating this alternative procedure in the California Building Energy Code Compliance software (CBECC).

On September 11, 2024, the California Energy Commission (CEC) adopted the 2025 Energy Code, contained in the California Code of Regulations (CCR), Title 24, Part 1, Chapter 10, and Part 6, which went into effect January 1, 2026. The 2025 Energy Code defines a “relocatable public school building” as “a relocatable building as defined by Title 24, Part 1, Section 4-314, which is subject to Title 24, Part 1, Chapter 4, Group 1.” Additionally, Section 10-109(h) of the 2025 Energy Code states, “In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures or protocols that demonstrate compliance with Part 6.”

In this report, CEC staff proposes an additional alternative procedure to the Nonresidential Appendix NA4 specification “Compliance Procedures for Relocatable Public School Buildings.” This procedure aligns with the alternative compliance approach allowed by DSA, in accordance with Procedure PR 18-02 published on November 12, 2025. Specifically, the proposed alternative procedure allows modeling of the energy use of relocatable public school buildings for climate zone groups based on the performance in a representative climate zone, and oriented for the four cardinal azimuths, i.e. north, east, south, west.

CEC staff has analyzed the proposed alternative procedure for demonstrating compliance and determined that the proposed alternative specification is technically feasible and that relocatable public school buildings following the proposed alternative procedure would result in compliance with the 2025 Energy Code. CEC staff recommends Commission approval of this alternative compliance procedure. CEC staff further recommends incorporating this alternative procedure in the California Building Energy Code Compliance software (CBECC), which is a CEC-approved software for demonstrating performance compliance with the nonresidential provisions of the 2025 Energy Code.



# CHAPTER 1:

## Introduction

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### Alternative Compliance Procedures

California Public Resources Code, Section 25402.1(b) requires the California Energy Commission (CEC) to establish a process for certifying new products, materials, and calculation methods for demonstrating compliance with its building energy efficiency standards. Section 10-109(h) of the 2025 Energy Code states, "In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures that demonstrate compliance with Part 6."

This staff report presents the CEC staff's recommendation for approval of an alternative compliance procedure for relocatable public school buildings.

### Existing Compliance Procedures for Relocatable Public School Buildings

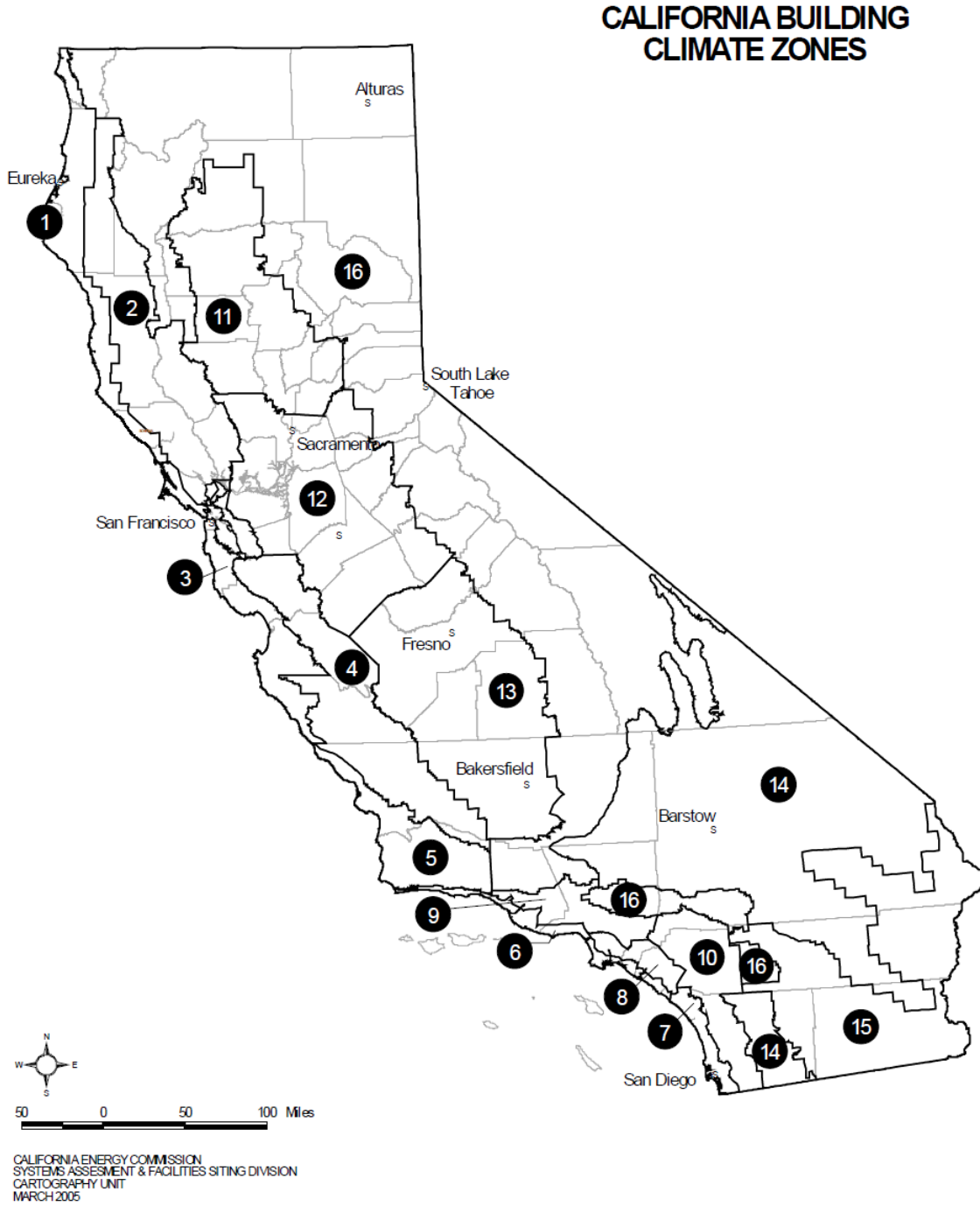
A relocatable public school building is a relocatable building as defined by Title 24, Part 1, Section 4-314, which is subject to Title 24, Part 1, Chapter 4, Group 1. These buildings are manufactured at a central location and shipped and installed in any California climate zone. Once they arrive at the school site, they may be positioned so that the windows face in any direction. During the life of a relocatable public school building, it may be relocated to a different location on the same campus or on a different campus. The portable nature of relocatable public school buildings requires that a special procedure be followed for showing compliance when the whole building performance method is used. The Division of the State Architect is the enforcement agency for these buildings.

The 2025 Energy Code metrics used to determine compliance are long-term system cost (LSC) and source energy, defined as follows:

- **Long-term system cost (LSC)** is the CEC-projected present value of costs to California's energy system over a period of 30 years. LSC does not represent a prediction of individual utility bills.
- **Source energy** is defined as the long run hourly marginal source energy of fossil fuels that are combusted as a result of building energy consumption either directly at the building site or caused to be consumed to meet the electrical demand of the building considering the long-term effects of Commission-projected energy resource procurement. For a given hour, the value in that hour for each forecasted year is averaged to establish a lifetime average source energy.

The 2025 Energy Code considers 16 geographic areas (termed climate zones and abbreviated as CZs) of California for which the Commission has established typical weather data, prescriptive packages, and energy budgets. These climate zones are defined by ZIP code and listed in Reference Joint Appendix JA2. Figure 1 is an approximate map of the 16 climate zones.

**Figure 1: California Climate Zones**



Source: 2025 Energy Code

There are two approved compliance procedures for relocatable public school buildings, which are described in Appendix NA4 of the Energy Code Reference Appendices "Compliance Procedures for Relocatable Public School Buildings."

## **Existing Procedures in Appendix NA4**

The standard design for relocatable public school buildings uses the same location as the proposed design building, with characteristics defined by the prescriptive criteria listed in either Table 140.3-D or Table 140.3-B of the 2025 Energy Code. The characteristics are listed in Appendix NA4.3 as Options (a) and (b):

### **Option (a) — Prescriptive Criteria specified by Table 140.3-D in the Standards**

Table 140.3-D of the 2025 Energy Code may be used for relocatable school buildings that can be installed in any climate zone in the state. In this case, compliance is demonstrated in climate zones 14, 15, and 16 (the climate zones requiring the most stringent measures to comply) as evidence that the classroom will comply in all climate zones. These relocatable public school buildings will have a permanent label that allows it to be used anywhere in the state as specified in Section 140.3(a)8 of the standards.

### **Option (b) — Prescriptive Criteria specified by Table 140.3-B in the Standards**

Table 140.3-B of the 2025 Energy Code may be used for relocatable school buildings that are to be installed only in specific climate zones. In this case, compliance is demonstrated in each climate zone for which the relocatable public school building has been designed to comply. These relocatable public school buildings will have a permanent label that identifies in which climate zones it may be installed as specified in Section 140.3(a)8 in the 2025 Energy Code. It is not lawful to install the relocatable public school building in other climate zones.

Since relocatable school buildings can be positioned for any azimuth, Appendix NA4.3 specifies performing compliance calculations for multiple azimuths. The required azimuths are 30, 75, 120, 165, 210, 255, 300, and 345 degrees.

## **DSA PR18-02 Alternative**

On November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 (DSA Staff 2025) that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code. The approach allows building designs analyzed using the performance compliance approach to evaluate performance for the four cardinal azimuths and introduced the climate zone group method as an acceptable alternate method of compliance.

### *Building Orientation*

DSA PR 18-02 specifies that building designs are analyzed using the performance approach in the four cardinal azimuths: north (0 deg), east (90 deg), south (180 deg), and west (270 deg)<sup>2</sup>. The building and orientation with the smallest compliance margin (that is, the least energy efficient variation) shall be used as the basis for design.

### *Climate Zone Groups*

DSA PR 18-02 specifies that each building design be submitted to comply with the climate zone which has the highest Grouped Severity Ranking within a given climate zone group (Table 1). Climate zones were grouped based on several factors, including proximity, similarity in climate, and similarities in the prescriptive design criteria set forth in the Energy Code. DSA

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<sup>2</sup> The front entrance door for the relocatable public school building faces each azimuth considered in the analysis.

assessed the Grouped Severity Ranking according to the heating design days (HDD) and cooling design days (CDD) of each climate zone, where a higher ranking represents a higher HDD + CDD. Climate Zone 15 is not included in any climate zone group because it is more severe than some climate zone groups for heating and other climate zone groups for cooling. The climate zone with the highest Grouped Severity Rating is indicated in bold in Table 1.

**Table 1: Proposed Climate Zone Groups**

<b>Climate Zone Group</b>	<b>Climate Zones</b>
A	1, <b>16</b>
B	2, 3, <b>4</b> , 5
C	6, 7, 8, 9, <b>10</b>
D	11, 12, 13, <b>14</b>

Source: Division of State Architect PR 18-02

### **Proposed Alternative Compliance Procedure – Climate Zone Groups Paired With Cardinal Azimuths**

The Division of the State Architect communicated to CEC staff that it developed PR 18-02 because often relocatable public school buildings are moved across climate zones since many school districts cross climate zones.

In conjunction with analyzing the climate zone groups, CEC staff also analyzed the energy use of relocatable public school buildings by azimuth. CEC staff investigated the currently required azimuths (30, 75, 120, 165, 210, 255, 300, and 345 degrees); the cardinal azimuths (0, 90, 180, and 270 degrees), as well as the 45, 135, 225, and 315 degree azimuths.

Based on the analysis, CEC staff proposes an alternative compliance procedure that aligns with DSA’s PR18-02 using representative climate zones to demonstrate compliance for specified climate zone groups, and rotating the relocatable public school building to the cardinal azimuths of 0, 90, 180, and 270 degrees to demonstrate compliance.

This procedure is described in Chapter 3.

## CHAPTER 2: Staff Evaluation

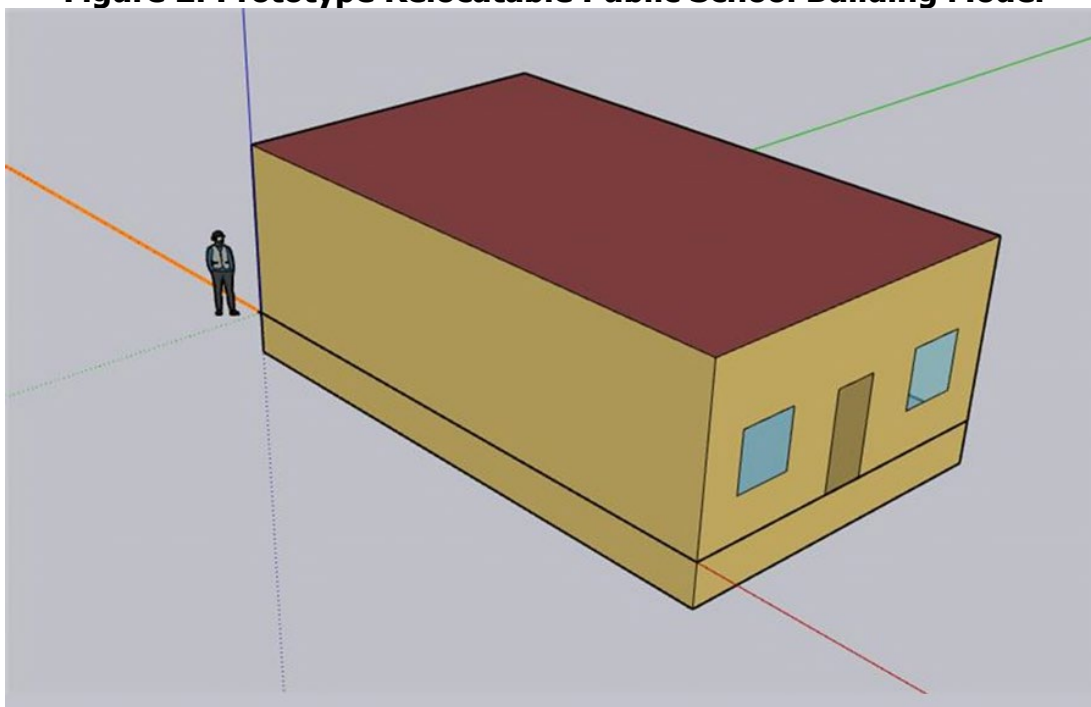
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To develop this alternative compliance procedure, CEC staff, in collaboration with NORESCO and the Division of the State Architect, developed a prototype relocatable school building model. NORESCO is a technical consultant to the CEC. Staff used the prototype to determine the long-term system cost (LSC) and source energy of the building across all azimuths and climate zones. The worst performing climate zone was selected as the representative climate zone for each climate zone group.

### Relocatable Public School Building Prototype

The relocatable public school building was modified from a Database of Energy Efficiency Resources (DEER) prototype developed by the California Public Utilities Commission. It is 40 feet deep by 24 feet wide, with a ceiling height of 12 feet and a 3-foot crawlspace. At the front of the building, there is a 7-foot-tall by 3-foot-wide door and two 4-foot-by-4-foot windows. At the back of the building there is a 4-foot-by-4-foot window (Figure 2).

**Figure 2: Prototype Relocatable Public School Building Model**



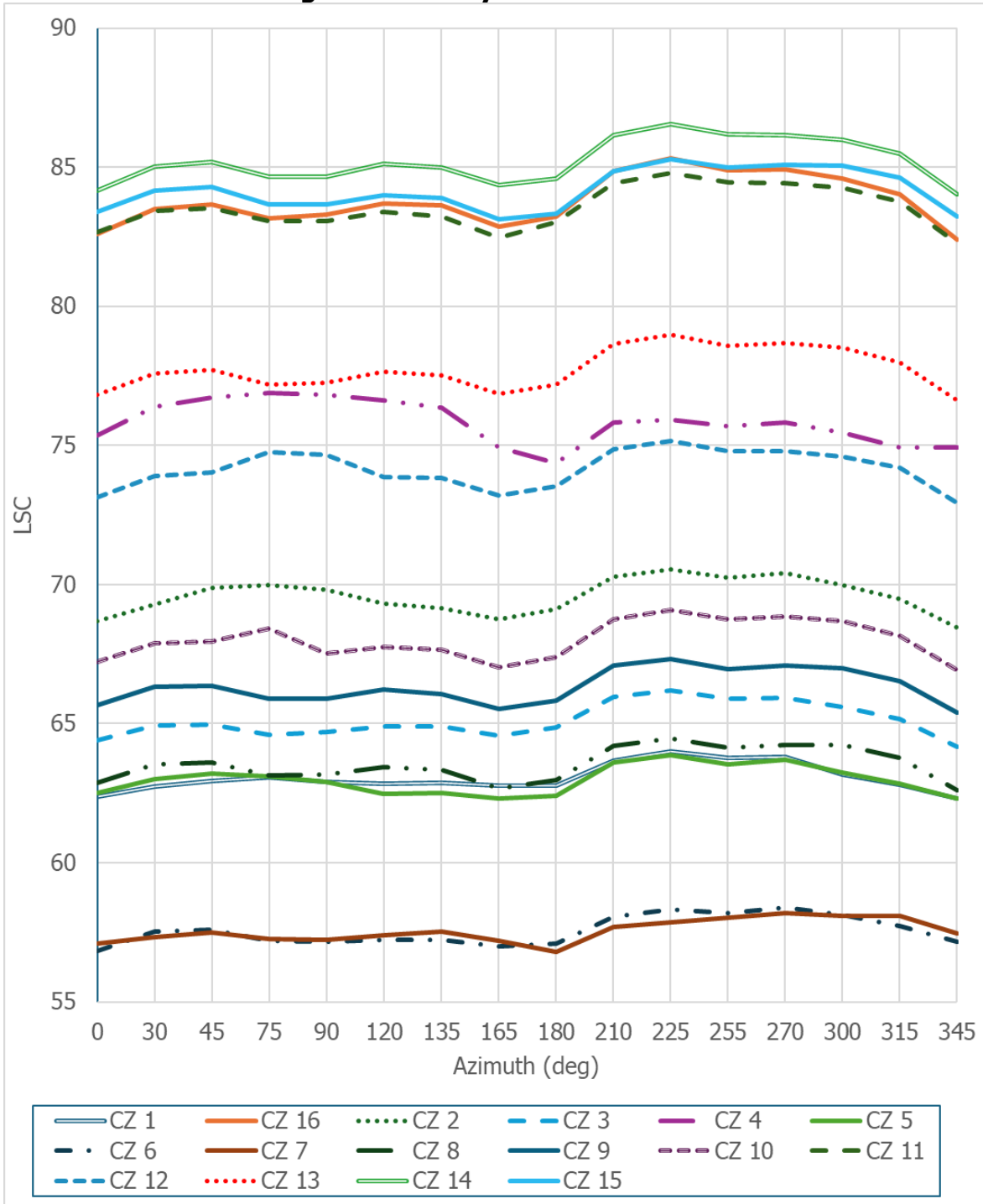
Source: DEER Building Prototype System User Guide, Version 1.0, 2024

# CZ Grouping Analysis

## LSC by Climate Zone and Azimuth

Figure 3 shows the LSC values of the prototype school building in every climate zone, split by climate zone group, across azimuths from 0 to 345 degrees in 15-degree intervals.

**Figure 3: LSC by CZ and Azimuth**



Source: NORESKO analysis

## LSC by Azimuth

Table 2 shows the LSC values of the prototype school building in every climate zone, split by climate zone group, across azimuths from 0 to 345 degrees in 15-degree intervals. Highlighted in green are the climate zones with the highest LSC in each grouping. Highlighted in red are the maximum LSC values of the building oriented for the cardinal azimuths in each climate zone. Highlighted in peach are the maximum LSC values of the building in each climate zone across all azimuths.

**Table 2: LSC by Azimuth**

Max of Cardinal Azimuths																			
Max of all Azimuths																			
Worst CZ in Group																			
Azimuth		0	30	45	75	90	120	135	165	180	210	225	255	270	300	315	345		
<b>A</b>																			
1		62.4	62.8	62.9	63.1	62.9	62.8	62.9	62.8	62.8	63.7	64.0	63.8	63.8	63.2	62.8	62.3		
16		82.6	83.5	83.7	83.2	83.3	83.7	83.6	82.9	83.2	84.9	85.3	84.9	84.9	84.6	84.0	82.4		
<b>B</b>																			
2		68.7	69.3	69.9	70.0	69.8	69.3	69.1	68.8	69.1	70.3	70.5	70.3	70.4	70.0	69.5	68.4		
3		64.4	64.9	65.0	64.6	64.7	64.9	64.9	64.6	64.9	65.9	66.2	65.9	65.9	65.6	65.2	64.2		
4		75.3	76.4	76.7	76.9	76.8	76.6	76.4	74.9	74.4	75.8	75.9	75.7	75.8	75.5	74.9	74.9		
5		62.5	63.0	63.2	63.1	62.9	62.5	62.5	62.3	62.4	63.6	63.9	63.6	63.7	63.2	62.8	62.3		
<b>C</b>																			
6		56.8	57.5	57.6	57.2	57.2	57.2	57.2	57.0	57.1	58.1	58.3	58.2	58.4	58.1	57.7	57.2		
7		57.1	57.3	57.5	57.3	57.2	57.4	57.5	57.2	56.8	57.7	57.9	58.0	58.2	58.1	58.1	57.5		
8		62.9	63.5	63.6	63.1	63.2	63.4	63.3	62.7	63.0	64.2	64.5	64.1	64.2	64.2	63.8	62.6		
9		65.6	66.3	66.3	65.9	65.9	66.2	66.1	65.5	65.8	67.1	67.3	67.0	67.1	67.0	66.5	65.4		
10		67.2	67.9	68.0	68.4	67.5	67.8	67.6	67.0	67.4	68.8	69.1	68.8	68.9	68.7	68.2	66.9		
<b>D</b>																			
11		82.7	83.4	83.5	83.1	83.1	83.4	83.2	82.5	83.0	84.4	84.8	84.4	84.4	84.3	83.8	82.3		
12		73.1	73.9	74.0	74.8	74.7	73.9	73.8	73.2	73.5	74.9	75.2	74.8	74.8	74.6	74.2	72.9		
13		76.8	77.6	77.7	77.2	77.3	77.6	77.5	76.8	77.2	78.7	79.0	78.6	78.7	78.5	78.0	76.6		
14		84.2	85.0	85.2	84.7	84.7	85.1	85.0	84.3	84.6	86.1	86.6	86.2	86.2	86.0	85.5	84.0		
<b>n/a</b>																			
15		83.4	84.2	84.3	83.7	83.7	84.0	83.9	83.1	83.3	84.9	85.3	85.0	85.1	85.1	84.6	83.2		

Source: NORESKO analysis

Staff found that for all climate zones except CZ 4, the maximum LSC was observed when the building was oriented at 225 degrees, while the maximum LSC for cardinal azimuths was observed when the building was oriented at 270 degrees. Staff found minimal difference in the maximum LSC between these two orientations. For example, in CZ 12, the maximum LSC for all azimuths is \$75.2 at 225 degrees, while the maximum LSC for cardinal orientations is \$74.8 at 270 degrees, a difference of less than 1%. In contrast, CZ 4 demonstrated a maximum LSC value of \$76.8 when oriented at 90 degrees, while the maximum LSC for all azimuths was \$76.9 at 75 degrees.

### CZ 4 Anomaly

Climate Zone 4 is an anomaly as the 90 degree maximum is marginally higher than the 270 degree maximum. This anomaly could be due to differences in morning/afternoon LSCs or



# **CHAPTER 3:**

## **Proposed Alternative Compliance Procedure**

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CEC staff proposes an alternative compliance procedure for relocatable public school buildings.

The standard building design is based on Table 140.3-B.

This compliance procedure allows the modeling of a representative climate zone to demonstrate compliance in each climate zone group, as follows:

- Climate zone 16 represents Group A (CZ 1, 16)
- Climate zone 4 represents Group B (CZ 2, 3, 4, 5)
- Climate zone 10 represents Group C (CZ 6, 7, 8, 9, 10)
- Climate zone 14 represents Group D (CZ 11, 12, 13, 14)
- Climate zone 15 is kept separate from the groups.

Compliance in the representative climate zone will be used to demonstrate that the relocatable public school building will comply in all climate zones for each group. These relocatable public school buildings will have a permanent label that allows it to be used in the climate zones that are included in each group. It is not lawful to install the relocatable public school building in other climate zones.

This procedure requires the building to be rotated through the four cardinal azimuths: 0, 90, 180, 270 degrees. The CBECC software will be modified to automate the rotation of the building through the cardinal azimuths and report the compliance results.

## GLOSSARY

<b>Term</b>	<b>Definition</b>
Azimuth	The degrees of clockwise rotation from true north.
California Energy Commission (CEC)	The state agency leading California to a 100 percent clean energy future for all. As the state's primary energy policy and planning agency, the Energy Commission is committed to reducing energy costs and environmental impacts of energy use while ensuring a safe, resilient, and reliable supply of energy.
California Building Energy Code Compliance (CBECC)	An open-source compliance software that may be used by code agencies, rating authorities, or utility programs in the development of energy codes, standards, or efficiency programs. Architects, engineers, and energy consultants may also use CBECC to demonstrate compliance with energy codes or beyond-code programs.
Climate zones (CZ)	The 16 geographic areas of California for which the CEC has established typical weather data, prescriptive packages, and energy budgets.
Cooling degree day (CDD)	A unit, based on temperature difference and time, used in estimating fuel consumption and specifying nominal annual cooling load of a building. An outdoor temperature of 65°F is considered comfortable, requiring no heating or cooling. For any one day when the mean temperature is greater than 65°F (18°C), there exist as many cooling degree days as there are Fahrenheit degrees difference in temperature between mean temperature for the day and 65°F (18°C).
Database of Energy Efficiency Resources (DEER)	A database that contains information about selected energy-efficient technologies and measures in residential and nonresidential applications.
Division of the State Architect (DSA)	The California state agency that provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and state-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes.

Energy Code	Proposed and adopted by the CEC to reduce wasteful and unnecessary energy consumption in newly constructed buildings, and additions and alterations to existing buildings. The Energy Code is updated every three years. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 version of the Energy Code.
Heating degree day (HDD)	A unit, based on temperature difference and time, used in estimating fuel consumption and specifying nominal annual heating load of a building. An outdoor temperature of 65°F is considered comfortable, requiring no heating or cooling. For any one day when the mean temperature is less than 65°F (18°C), there exist as many heating degree days as there are Fahrenheit degrees difference in temperature between mean temperature for the day and 65°F (18°C).
Long-term system cost (LSC)	The CEC-projected present value of costs to California's energy system over 30 years. LSC does not represent a prediction of individual utility bills.
Relocatable public school building	A relocatable building as defined by Title 24, Part 1, Section 4-314, which is subject to Title 24, Part 1, Chapter 4, Group 1.
Source energy	The long-run hourly marginal source energy of fossil fuels that are combusted as a result of building energy consumption either directly at the building site or caused to be consumed to meet the electrical demand of the building considering the long-term effects of Commission-projected energy resource procurement. For a given hour, the value in that hour for each forecasted year is averaged to establish a lifetime average source energy.

# REFERENCES

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Department of the State Architect Staff. November 2025 *PROCEDURE: CALGREEN/ENERGY CODE REVIEW (CGE) FOR PRE-CHECK (PC) BUILDING DESIGNS AND THE CONSTRUCTION, RELOCATION AND/OR ALTERATION OF RELOCATABLE BUILDINGS*. Department of the State Architect. Publication Number: PR 18-02. Available at <https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/procedures/PR-18-02.pdf>

# APPENDIX A:

## Detailed Specification for Prescriptive Option for Relocatable Public School Buildings

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This specification describes an alternative compliance procedure to the compliance procedures described in the 2025 Nonresidential Appendix, NA4. This alternative compliance procedure may be followed when the whole building performance approach is used for relocatable public school buildings.

Prescriptive envelope compliance with the 2025 Energy Code may be demonstrated for relocatable public school buildings in each of the Climate Zone Groups in Table A-1 by meeting the prescriptive envelope criteria of Table 140.3-B for the representative climate zone (shown in **bold** in Table A-1). The prescriptive envelope criteria also are used in the standard design for performance standards compliance. Each relocatable public school building will have a permanent label that allows it to be used in the appropriate climate zones. It is not lawful to install the relocatable public school building in other climate zones.

**Table A-1: Proposed Climate Zone Groups**

<b>Climate Zone Group</b>	<b>Climate Zones</b>
A	1, <b>16</b>
B	2, 3, <b>4</b> , 5
C	6, 7, 8, 9, <b>10</b>
D	11, 12, 13, <b>14</b>

Source: Division of State Architect PR 18-02

The building envelope of the standard design has the same geometry as the proposed design, including window area and position of windows on the exterior walls, and meets the prescriptive requirements specified in Section 140.3. Lighting power for the standard design meets the prescriptive requirements specified in Section 140.6. The HVAC system for the standard design meets the prescriptive requirements specified in Section 140.4. The system typically installed in relocatable public school buildings is a single-zone packaged heat pump or furnace. Most relocatable public school buildings do not have water-heating systems, so this component is neutral in the analysis. Other modeling assumptions such as

equipment loads are the same for the proposed design and the standard design and are specified in the Nonresidential ACM Reference Manual.

The manufacturer shall certify compliance with the standards and all compliance documentation shall be provided. If the manufacturer chooses to comply using this alternative compliance procedure for compliance in only specific climate zone groups, then the manufacturer shall indicate the climate zones in the climate zone group for which the classroom will be allowed to be located, as specified in Section 140.3(a)8 of the 2025 Energy Code.

Since relocatable public school buildings could be positioned for any azimuth, it is necessary to perform compliance calculations for multiple azimuths. Each model with the same proposed design energy features shall be rotated through the cardinal azimuths in the representative climate zone for the proposed climate zone group. Approved compliance programs shall automate the rotation of the building and reporting of the compliance results to ensure it is done correctly and uniformly and avoid unnecessary documentation.

The program shall present the results of the compliance calculations in a format similar to Table A-2. For each of the cases illustrated in Table A-2 (four azimuths for the representative climate zone in each climate zone group), the long-term system cost (LSC) for the standard design and the proposed design are shown. (The energy features of the proposed design shall be the same for all azimuths). The final column shows the compliance margin, which is the difference between the LSC for the proposed design and the standard design. Approved compliance programs shall scan the data presented in the format of Table A-2 and prominently highlight the case that has the smallest compliance margin. A similar table of cases shall be evaluated for Source Energy.

Complete compliance documentation shall be submitted for the building and energy features that achieve compliance for the representative climate zone in the climate zone group and all of the azimuths as represented by the case with the smallest compliance margin for both LSC and Source Energy. DSA may require that compliance documentation for other cases also be submitted; showing that the proposed design building and energy features are identical to the case submitted, in each azimuth and climate zone. Rows shall be included for each representative climate zone group for which the manufacturer wants the relocatable public school building to be allowed to be installed.

**Table A-2: Summary of Compliance Calculations Needed for Relocatable Public School Buildings for LSC Compliance**

<b>Climate Zone Group</b>	<b>Azimuth</b>	<b>LSC Proposed Design</b>	<b>LSC Standard Design</b>	<b>LSC Compliance Margin</b>
A	0			
A	90			
A	180			
A	270			

Source: CEC Staff analysis



## MEMORANDUM

TO: Docket 26-BSTD-01

FROM: Will Vicent, Deputy Director

SUBJECT: Basis for finding that the action of approving an alternative procedure for relocatable public school buildings under the 2025 Energy Code is not a project and is otherwise exempt from the California Environmental Quality Act under the Common-Sense Exemption.

DATE: June 24, 2026

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### I. California Environmental Quality Act (CEQA)

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

### II. Alternative Procedures for Energy Code Compliance (Title 24, Section 10-109(h))

The California Energy Commission (CEC) adopts and regularly updates regulations for new construction, additions, and alterations to residential and nonresidential buildings, which are contained in California Code of Regulations, Parts 1 and 6 (the California Energy Code). These regulations go through an extensive public process and are adopted at a CEC business meeting before going into effect.

Part 1 of the Energy Code includes administrative regulations for implementation. In certain circumstances, interested parties or the CEC may identify alternative procedures that meet the minimum requirements of the Energy Code, but that require additional regulatory action to ensure compliance and consistency with the Energy Code. In these situations, section 10-109(h) of the 2025 Energy Code states that “In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures that demonstrate compliance with Part 6.”

### **III. The Proposed Action**

On November 12, 2025, the Division of the State Architect (DSA) published Procedure PR 18-02 that introduced an alternative approach for demonstrating compliance with the 2025 Energy Code for relocatable public school buildings. The approach allowed relocatable public school building designs analyzed using the performance compliance approach to be evaluated for the four cardinal azimuths and introduced the climate zone group method as an acceptable alternate method of compliance.

In keeping with the CEC mission to maintain accurate and technically feasible compliance procedures, CEC staff proposes an additional alternative procedure to the Nonresidential Appendix NA4 “Compliance Procedures for Relocatable Public School Buildings” specification of the 2025 Energy Code to align with the alternative compliance approach allowed by DSA. Specifically, CEC staff proposes an alternative compliance procedure that aligns with DSA’s PR 18-02 using representative climate zones to demonstrate compliance for specified climate zone groups, and rotating the relocatable public school building to the cardinal azimuths of 0, 90, 180, and 270 degrees to demonstrate compliance. The CEC provided a copy of the proposed alternative procedure to interested parties on May 4, 2026, and accepted comments through June 11, 2026. No comments were received.

CEC staff analyzed the proposed alternative procedure for demonstrating compliance and determined that it is technically feasible and effective at reducing the building energy budget to save at least as much energy as currently approved 2025 Energy Code compliance approaches. Therefore, CEC staff and the Executive Director recommended the CEC approve the additional alternative procedure to the Nonresidential Appendix NA4 “Compliance Procedures for Relocatable Public School Buildings” specification of the 2025 Energy Code, consistent with Section 10-109(h). CEC staff and the Executive Director further recommended incorporating this alternative procedure in the California Building Energy Code Compliance software (CBECC), which is a CEC-approved software for demonstrating performance compliance with the nonresidential provisions of the 2025 Energy Code.

The CEC is considering making findings regarding the alternative procedure for relocatable public school buildings at the CEC’s July 8, 2026, Business Meeting.

### **IV. CEC findings regarding relocatable public school buildings is not a CEQA project**

A “project” under CEQA is defined as the “whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (CCR, Title 14, section 15378(a)). The CEC’s findings regarding alternative procedures for public school buildings do not constitute a “project” under CEQA since it is not an activity that may

cause a direct or reasonably foreseeable indirect physical change to the environment.

In its findings approving an alternative procedure for relocatable public school buildings, the CEC does not change the minimum requirements of the 2025 Energy Code. Instead, CEC is approving a voluntary alternative compliance pathway that guarantees, at least, the same action as already required by the regulations. Additionally, the CEC's proposed action ensures consistency with DSA's existing Procedure PR 18-02. The CEC's actions in approving the alternative procedure for relocatable public school buildings on its own do not amount to actions that may cause a direct or reasonably foreseeable indirect physical change to the environment, as provided by the CEQA definition for a "project" (CCR, Title 14, section 15378(a)). Accordingly, the CEC's actions are not a "project" for purposes of CEQA.

**V. If CEC's findings regarding the alternative procedure for relocatable public school buildings were considered a project, they are exempt from CEQA under the Common-Sense Exemption**

Even if considered a project under CEQA, the CEC's approved findings in accordance with section 10-109(h) are exempt from CEQA under the Common-Sense Exemption. The Common-Sense Exemption states that, "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" (CCR, Title 14, 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 (Public Resources Code, section 21068; CCR, Title 14, section 15382).

The Common-Sense Exemption would apply as it can be seen with certainty that there is no possibility that the CEC's findings regarding the alternative procedure for relocatable public school buildings will have a significant effect on the environment (CCR, Title 14, sections 15061(b)(3) and 15061(a)). As discussed above, the proposal conforms to the existing DSA Procedure PR 18-02 and CEC staff findings confirm that this alternative procedure meets, at a minimum, the requirements in the 2025 Energy Code. It does not require any particular project or design to engage in any activity that was not already evaluated during the 2025 Energy Code rulemaking, which published an initial study and negative declaration for the 2025 Energy Code as a whole. For these reasons, the CEC's approval of the alternative procedure for relocatable public school buildings is not subject to CEQA under the Common-Sense Exemption, section 15061(b)(3).

**VI. Conclusion**

As provided above, the approval of an additional alternative procedure to the Nonresidential Appendix NA4 “Compliance Procedures for Relocatable Public School Buildings” specification of the 2025 Energy Code is not subject to CEQA because the CEC’s findings do 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. Even if it is a project, it is exempt from CEQA pursuant to the Common-Sense Exemption (CCR, Title 14, section 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.