Meeting Notes: February 17, 2026

Posted March 3, 2026

These notes summarize the content from the 2028 Title 24, Part 6 Code Cycle Utility-Sponsored Stakeholder Meeting on Nonresidential Covered Processes – Utility-Sponsored Stakeholder Meeting

If you are interested in providing input on any of the topics covered in this meeting, please email your comments to info@title24stakeholders.com by March 17, 2026. Comments received after then may not be incorporated into the final version of the CASE Report.

Quick Links

- ***Key Points from Meeting*** – Read through highlights from each measure and review feedback requested from stakeholders.
- ***In-Meeting Questions / Comments*** – Navigate directly to questions asked during the meeting and responses from CASE Authors
- ***Zoom Polls & Responses*** – Review the Poll Questions asked during the meeting and see the responses from stakeholders.
- ***Meeting Materials*** (available on Title24Stakeholders.com) – Review slides, measure summaries, proposed code language and more on our website.

Meeting Information

Meeting Date: 2/17/2026
Meeting Time Scheduled: 10 am – 12:00 pm PT
Meeting Host: California Statewide Utility Codes and Standards Team

Meeting Agenda

Time	Topic	Presenter
10:00	Welcome	Cosimina Panetti
10:10	Overview of California Energy Code	Payam Bozorgchami
10:15	Role of PG&E, SCE, and SCG&E	Kelly Cunningham
10: 25	Proposed Code Changes for Boiler Systems	Shafi Amoni Shafi Amoni shafi.amoni@cascadeenergy.com
12:00	Adjourn	

Members of the CASE Team

1.1.1 Statewide Utility Codes and Standards Team – Utility Staff

Name	Email Address	Affiliation
Kelly Cunningham	kelly.cunningham@pge.com	PG&E
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Thomas Mertens	thomas.mertens@pge.com	PG&E
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1.1.2 Statewide Utility Codes and Standards Team – Codes and Standards Enhancement (CASE) Team Members

Name	Email Address	Affiliation
Cosimina Panetti	**cpanetti@energy-solution.com**	**Energy Solutions**
Heidi Werner	**hwerner@energy-solution.com**	**Energy Solutions**
Nikki Westfall	**nwestfall@energy-solution.com**	**Energy Solutions**
Chris Uraine	**curaine@energy-solution.com**	**Energy Solutions**
Remy Hutheesing	**rhutheesing@energy-solution.com**	**Energy Solutions**

California Energy Commission

Contact for 2028 Code Cycle:

Any questions for the CEC can be sent to: EnergyCodeUpdateInquiries@energy.ca.gov

CEC Docket

Comments on the 2028 Energy Code update can be formally submitted to the docket:
https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=25-BSTD-03

Key Points from Meeting

The purpose and benefits of each measure presented at this meeting are noted below. Specific topics we are looking for feedback on are highlighted.
To provide input, email the CASE Authors noted above or send to info@title24stakeholders.com.

CEC Introduction

- **Purpose**: AB130 Limits updates to building standards affecting residential units before 2031 code cycle
- **Benefits**: Increase cost-effective building efficiency and reduce GHG
- **Feedback requested**: Submit comments to CEC EnergyCodeUpdateInquiries@energy.ca.gov.

Statewide Utility and Code Standards Team

- **Purpose**: Support the CEC in developing proposed changes to Energy Code
- **Benefits**: Improve compliance, finding energy savings, reducing emissions, and GHG reduction
- **Feedback requested**: Input on the code change proposal

Boiler Stack Oxygen Concentration Comment Letter

- **Purpose**: Stakeholder feedback
- **Benefits**: Update existing Stack O_2 requirements for boiler systems
- **Feedback requested**:
  - What is the technical feasibility of meeting both stack O_2 requirements and AQMD NOx emissions requirements?
  - Are the proposed stack oxygen concentration limits for each boiler/burner type appropriate?
  - Is it clear in this code language that there are no requirements for specific turndown capabilities?

Proposed Boiler Stack Economizer Measure

- **Purpose**: To recover heat typically lost to combustion exhaust in process boilers.
- **Benefits**: To reduce the energy consumed by process boilers, reduce boiler load and thermal stress
- **Feedback requested**:
  - How often are newly installed boilers designated as 'low use boilers'? Why?

- Are there any concerns with stack economizer reliability or maintenance?
- Are there differing estimates of current market share from 35%?
- Any feedback on or concerns with market share, cost, or electricity estimates.

Proposed Boiler Automatic Blowdown and Deaerator Pressure Measure

- **Purpose**: To require new process boilers to use energy-efficient operational practices.
- **Benefits**: Reduce the energy and water use of process boilers.
- **Feedback requested**: Any feedback on or concerns with market share or cost estimates or the proposed exception qualification process.

During the meeting, questions and comments were submitted in the Q&A pane in Zoom as well as asked aloud. Questions and answers are provided below.
Attendees were also asked to respond to polls. Navigate directly to the ***Zoom Polls & Responses*** by clicking the link.
Due to time limitations, not all written questions and comments were discussed during the meeting, but all have responses are available in these meeting notes.

Role of CA IOUs, Kelly Cunningham

1. **Question asked verbally by Danielle Hughes:** Requests that we are modeled in energy demand and cost effectiveness before the code moves forward

a. Kelly Cunningham: This is not an effort that focuses on benefits for PG&E's territory…but to inform the entire state. We have been named the statewide lead by CPUC. Colleagues from SDG&E can make introductions

2. **Question asked via Zoom question pane by Blaine Conner:** Code restructuring was not included in the meeting agenda. Will future agendas be more complete to include all topics requesting public input?

a. Nikki Westfall: Thank you for the feedback. We can certainly list this more explicitly in our agendas going forward. CEC will provide an introduction including providing information on the new restructured code on each of the upcoming stakeholder meetings.

Proposed Code Changes for Boiler Systems, Shafi Amoni

1. **Question asked via Zoom question pane by Blaine Conner**: On the justification for Process Boiler #2 proposed change: "Manual boiler blowdown is typically excessive, resulting in unnecessary losses. ". The draft CASE report does not appear to provide any backup information supporting the "excessive" language.
    a. Emma Conroy: Hi Blaine, we will make sure to respond to this when we get to the Process Boiler #2 Automatic Blowdown portion of the slides, but the underlying rationale is that facilities with manual blowdown typically blow down on regular schedules or on timing that are not at the optimal point based on conductivity.
2. **Question asked via Zoom question pane by Sara Letton**: Sustainability Coordinator with the City of South Lake Tahoe. City residents and businesses make up about half of all Liberty Utilities customers. We are up here in climate zone 16. I don't have a question, but want to reiterate the concerns of the earlier caller that our area has not been properly modeled in cost effectiveness. We are winter/nighttime peaking, unlike the rest of the state. I am voicing concerns for all the residents, visitors, and businesses in my City. I do not want to see any new energy code

passed or enforced until our zone is adequately modeled for cost effectiveness. Please reach out to coordinate a meeting. sletton@cityofslt.gov

   a. **Nikki Westfall**: **T**hank you for your comment. We would like to better understand this issue. We are looking into this topic and will reach out to discuss further.
   b. **Kelly Cunningham**: Sara, We see that Danielle sent an email to Nikki directly last Wednesday evening at around 7 pm. Nikki sees the email and planned to reply, but had not yet. She did not have an opportunity to meet with the broader team in the two business days that were left before the holiday weekend. We plan to reach out to you to see what the CASE team can do, and what will need to be a conversation with Danielle's colleagues at the CEC. Thank you.

3. **Question asked via Zoom question pane by Roger Baker**: Does the economic analysis assume that 100% of affected users will replace the economizer upon its failure at 15 years? Is there a mechanism in code to ensure continued compliance (ensure retention of savings over the 30 year horizon).
   a. **Emma Conroy**: Hi Roger, the economic analysis assumes boiler stack economizer retubing in Year 8 and Year 24 and economizer replacement in Year 15. The Energy Code is only enforced when a building permit is pulled, and does not have an enforcement mechanism to ensure ongoing compliance such as economizer retubing or replacement.

4. **Question asked via Zoom question pane by Blaine Conner:** Code restructuring was not included in the meeting agenda. Will future agendas be more complete to include all topics requesting public input?
   a. Nikki Westfall: Response: Thank you for the feedback. We can certainly list this more explicitly in our agendas going forward. CEC will provide an introduction including providing information on the new restructured code on each of the upcoming stakeholder meetings.

5. **Question asked via Zoom question pane by Blaine Conner:** On the justification for Process Boiler #2 proposed change: "Manual boiler blowdown is typically excessive, resulting in unnecessary losses. ". The draft CASE report does not appear to provide any backup information supporting the "excessive" language.
   a. **Emma Conroy**: Hi Blaine, we will make sure to respond to this when we get to the Process Boiler #2 Automatic Blowdown portion of the slides, but the underlying rationale is that facilities with manual blowdown typically blow down on regular schedules or on timing that are not at the optimal point based on conductivity.
6. **Question asked verbally by Blaine Connor**: Will strong language be backed up by strong data?
   a. **Shafi Amoni:** I will collect some data and send it out but consider asking stakeholder participants to provide additional information.
7. **Comment from Chat**: Elaborate on manual boiler blowdown being excessive and results in water losses.
   a. Using manual controls is not difficult to maintain border conductivity value but most industrial facilities have variations, which require different amounts of condensate resulting in different amounts of blowdown
8. **Question asked via chat pane by** For Process Boiler #1 proposed language about roof heights driving an economizer exception: Could more open-ended language be used mirroring CPC or NEC, such as "when practical" or "when structurally feasible" as opposed to a specific inches of

roof height? There are often more constraints that just a simple roof plane making installation of the economizers not feasible or increasing the payback period.

   a. **Emma Conroy:** Thank you for the feedback, the "when structurally feasible" language does seem like a good strategy for ensuring stack economizer placement is feasible. We agree that there are cases that are important to catch with this type of language. We do need to confirm precedent of the use of this sort of exception in T24 to be sure there are no unintended challenges for compliance or plan review related to such an exception. Can you please give examples of what additional constraints you're thinking of so we can properly consider how to address them?

9. **Question asked via chat pan by Nathan Koilbaba:** For the Deaerator pressure code requirement, how will the exception of "make-up water equal to or above 20%" be verified? Will data need to be continuously or periodically delivered, or will it be supplied once?
   a. **Shafi Amoni:** Fluctuations would change the amount of makeup water coming back because you have a high blast of makeup water that is going to reduce your DA temperature until the regulator catches up. The PE would note that they anticipate the system will face swings in make-up water equal to or above 20% of feedwater flow once during the design phase. Data would not be periodically delivered.
10. **Verbally question asked by Roger Baker:** Yeah, this is just a follow-up to the question I put in the chat that you responded to already. I appreciate the feedback on the cost-benefit and the impact of product retention over the life cycle. My personal experience from Illinois has been that, a fair number of economizers that have been put in place in previous years no longer are functioning, and the customers are not usually willing to repair them or replace them on their own without some urging. Since Title IX IV does not look at the retention of measures over time, it might be useful not only for the economies, but for all measures that have significant capital costs down the road, it might be useful to incorporate a retention value or retention fraction when you get to those, like, the 15-year milestone on the economizer, your cost-benefit analysis has enough headroom that you probably could assume that 25% of economizers will not get replaced at 15 years, and it would still be cost-effective on the analysis, but I think Including that factor would probably make the analysis more realistic.

Wrap-Up

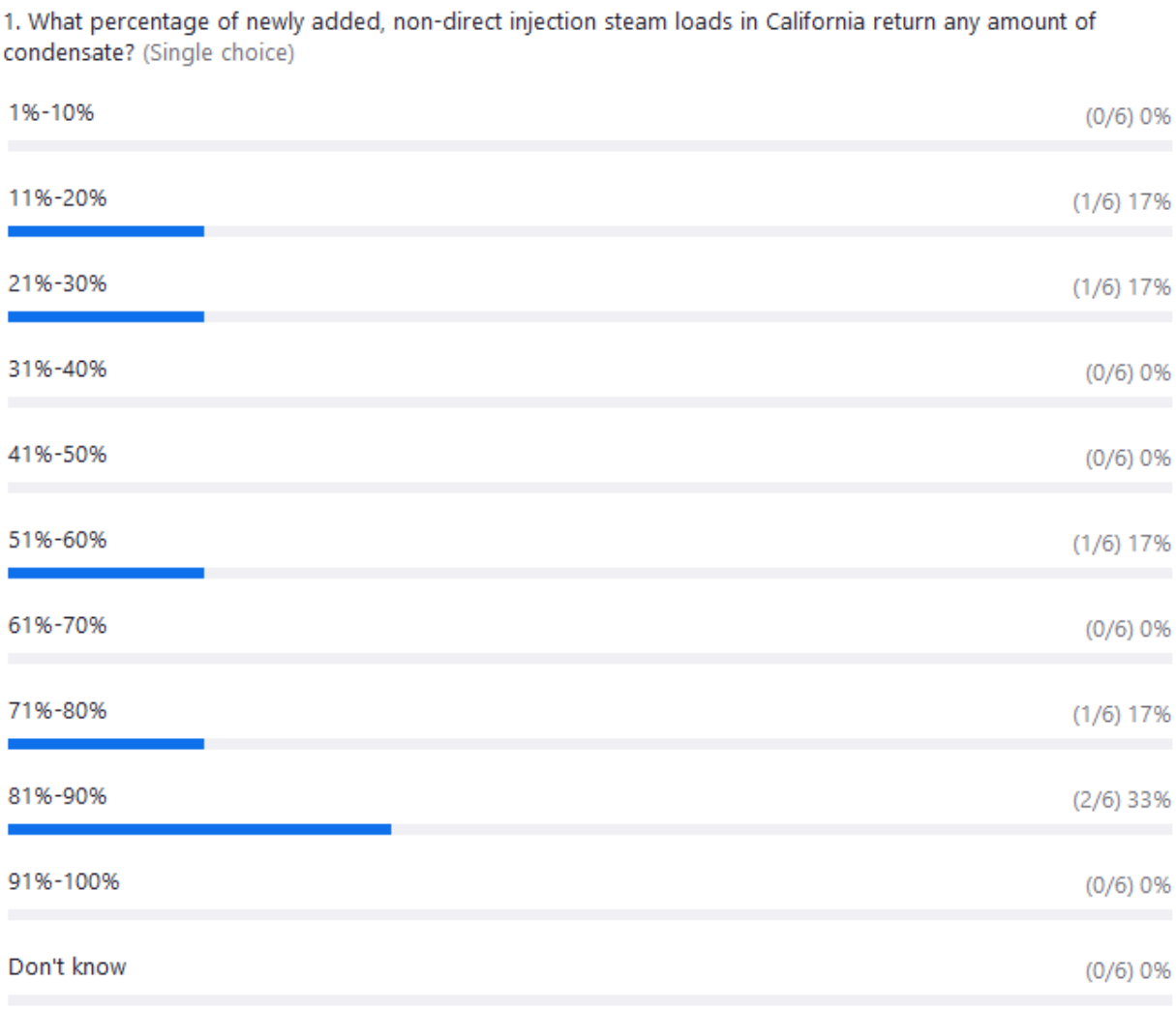
The meeting concluded with a call for participation throughout the code cycle. Several future meeting dates were presented. Draft CASE Reports will be posted through March 2026 on title24stakeholders.com.

Please reach out to the specific topic lead or info@title24stakeholders.com with input on the measures presented today.
The meeting adjourned at 11:23 am PT.

Zoom Polls & Responses

Multiple Choice Questions

1. For existing sites with flash steam recovery, what percentage of flash steam is recovered? (Single choice)



Long Answer Questions

Are you aware of any non-SCR technology available today that can meet strict NOx emissions limits at 3% operating stack oxygen?

Response 1 - No

Response 2 - No

What else should we know? Are there market or technical barriers or solutions we should consider?

Response 1 - Anecdotally, I've observed companies allowing their economizers to fail without repair, as those repair costs typically come from the maintenance budget, which is tight.

Response 2 - Going back to the NOx/O2 proposal, what did the documentation that set the original requirement say regarding feasibility? Where can that documentation be found?

Statewide CASE Team answer: Stack oxygen concentration requirements for Process Boilers were first introduced to Title 24, Part 6 in the 2013 code cycle (The CASE Report can be found here). The following requirements were set to cost-effectively save energy through combustion optimization:

Process boilers with a capacity of 5 to 10 MMBtu/h were required to maintain a stack-gas oxygen concentration less than or equal to 5%.
Process boilers with a capacity of more than 10 MMBtu/h were required to maintain a stack-gas oxygen concentration less than or equal to 3%.
Stack oxygen concentration requirements for Process Boilers in Title 24, Part 6 were updated to the current code language in the 2022 code to require a stack-gas oxygen concentration less than or equal to 3% for all process boilers with a capacity above 5 MMBtu/h after finding that oxygen trim technology was cost-effective for boilers between 5 and 10 MMBtu/h (Energy Solutions 2020). That CASE Report can be found here.

The 2013 report does not address technical feasibility concerns, and the 2022 report notes that the Statewide CASE Team did not expect any technical feasibility concerns with the updated oxygen concentration requirements. Neither directly address the potential conflict with AQMD NOx emissions limits.