



Sunnyvale

October 31, 2025

Mr. Drew Bohan, Executive Director
California Energy Commission
1516 9th Street, MS 37
Sacramento, CA 95814
LocalOrdinances@energy.ca.gov

City Hall
Community Development
456 West Olive Avenue
Sunnyvale, CA 94088-3707
408-730-7500
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**Re: California Energy Standards Code Approval Request
City of Sunnyvale Ordinance No. 3248-25**

Dear Mr. Bohan,

Please be advised that the Sunnyvale City Council has adopted amendments to the 2025 Edition of the 2025 California Green Building Standards Code (Title 24, Part 11) and the California 2025 Energy Code (Title 24, Part 6) via Ordinance No. 3248-25, enclosed. The City of Sunnyvale adopted Ordinance No. 3248-25 to require end-of-life air conditioner replacement with a heat pump conditioner.

In accordance with California Health and Safety Code Sections 17958.5, 17958.7 and 18941.5, Public Resources Code Section 25402.1 (h)2 and California Code of Regulations, Title 24, Part 1, §10-106, this package of materials demonstrates that the City of Sunnyvale determined that the local ordinance:

- Contains standards that are cost-effective, and these standards were adopted at a public meeting on October 21, 2025; and
- Will result in buildings designed to consume less energy than permitted by the 2025 California Energy Code.

Please find the following materials enclosed:

- Att. 1: This cover letter
- Att. 2: Staff report to the Sunnyvale City Council outlining the goals of the updated building standards. The staff report provides an explanation of the cost-effectiveness results summary, demonstrating the expected energy savings and the cost-effectiveness of the ordinance in the City of Sunnyvale/Climate Zone 4.
- Att. 3: Ordinance No. 3244-25, which adopts updates to the City's Building Ordinance, including requirements for energy reach standards beyond Title 24, Part 6 baseline for single-family residential additions, and alterations. This provides clear requirements that buildings be designed to consume no more energy than permitted by Part 6.



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- Att. 4: Evidence of CEQA compliance through the attached Notice of Exemption (Ordinance No. 3244-25).
- Att. 5: Cost-effectiveness Study
- Att. 6: Demonstration of cost effectiveness, summarizing how cost effectiveness study results informed the ordinance parameters.

The City will continue to enforce Title 24, Part 6, as well as the proposed local amendments in Attachment 3. The City, with the support of the California Statewide Codes and Standards Reach Code Program, has performed cost-effectiveness analyses and attached them in Attachment 5 as required by the California Energy Commission for the local amendments to the California Energy Code. City of Sunnyvale determined at public meetings on September 30, 2025, that the locally adopted amendment to the energy efficiency standards contained in Ordinance No. 3248-25 is cost-effective.

The proposed standards are more protective of the environment than the State standards, and there are no reasonably foreseeable adverse impacts, and so there is no possibility that the activity in question may have a significant effect on the environment. As the lead agency, the City has also determined that this activity is exempt from CEQA under section 15061(b)(3).

Thank you for considering our ordinance for approval by the Commission. If you should have any questions, please feel free to contact me for further information.

Sincerely,

Suzanne Park, PE, CBO
Chief Building Official
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408-730-7455

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