

**Subject: Does Disconnection From PG&E Affect Title 24 Energy Code Compliance**

**Question:** Does a building's disconnection from PG&E, or lack of PG&E service (off-grid), change whether the project must comply with California Title 24 Energy Code requirements?

**Bottom line:** No. Energy Code compliance is generally determined by the building type and permit scope, such as new construction, addition, or alteration, not by whether PG&E is currently serving the site. A project that is off-grid, disconnected from PG&E, or served by another utility is still generally subject to Title 24 if it is otherwise within the code's scope.

**Key point:** Title 24 regulates how efficiently the building performs, not whether the site is served by PG&E. The main question is usually how the building uses energy, not who delivers it.

**Interpretation:** Staff should not treat PG&E disconnection as an exemption from Title 24. For plan review and permit processing, the threshold question remains whether the permit scope places the project within Title 24, Part 6.

**How to apply it:** A newly constructed conditioned building generally must comply whether or not it is connected to PG&E. An addition or alteration generally must comply with the applicable Energy Code provisions whether or not PG&E service is active. A project does not become exempt simply because the applicant states it will be off-grid.

**Limited utility-related exception:** Utility status may matter for certain solar photovoltaic or battery requirements, but only through a specific California Energy Commission determination process or another code-recognized alternative compliance pathway. It is not an automatic waiver of Energy Code compliance.

**Staff direction:** Review the project under the normal Energy Code scope rules. If an applicant claims a utility-related hardship tied to solar or battery requirements, require the specific code basis, such as a cited exception, approved alternative, or applicable CEC determination.

**Primary sources:** *California Energy Commission 2025 Building Energy Efficiency Standards; 2025 Single-Family Solar PV FAQ; and Title 24, Part 1 Section 10-109(k) guidance.*

**Sources**

- California Energy Commission, 2025 Building Energy Efficiency Standards: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency>
- California Energy Commission, 2025 Building Energy Efficiency Standards for Residential and Nonresidential Buildings: <https://www.energy.ca.gov/publications/2025/2025-building-energy-efficiency-standards-residential-and-nonresidential>
- California Energy Commission, 2025 Single-Family Solar PV FAQ: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/energy-code-support-center-12>
- California Energy Commission, 2025 Energy Code Compliance Software: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-energy-code-compliance-software>
- California Energy Commission, discussion of Section 10-109(k): <https://www.energy.ca.gov/publications/2023/trinity-public-utility-districts-application-solar-photovoltaic-and-battery>