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Energy Code Accounting Methodology and PV

Dear Commission

My colleagues have recently observed some accounting anomalies in compliance surrounding photovoltaic and battery systems in new buildings. In an interrogation of these anomalies, we have (only recently) realized that the general accounting of PV and Battery systems is poorly described.

First, we've noted that there doesn't appear to be any discussion of how PV and Battery systems are accounted for in compliance, and specifically for exports. Staff has been very helpful in helping us understand this better, which we are thankful for (Trevor FTW!). Nevertheless, we've noted that the accounting metrics were not described in any of the accounting workshops, nor the associated reports. (If this is incorrect, we would generously accept corrections here)

Assuming this is true, we'd like to encourage the Commission to correct this in present and future rulemakings.

As the Commission is well aware--the cost-effectiveness and prudence of photovoltaic systems have experienced significant changes in recent years. There are a significant number of projects where net savings will not pass down to tenants in their utility bills, which is deeply unfortunate outcome when PV is code prescribed based on cost-effectiveness. The vast majority of projects don't have the time or the resources to initiate a formal reevaluation and adjudication with the Commission (e.g. Turlock Monte Vista Apartments). And this is already on top of a measure that has at best a colorable relationship with energy conservation.

The least that the Commission can do here is be clear and transparent about accounting. Is a couple of slides in a workshop presentation too much to ask, and perhaps some deltas and sigmas in a simple paragraph in the ACMs?

Luke Morton
(writing on behalf of all my colleagues that the your army energy code apologists)