BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of, ADOPTION OF THE PROPOSED 2013 BUILDING ENERGY EFFICIENCY STANDARDS	Docket No. 12-BSTD-1 RE: 2013 Building Energy Efficiency Standards

COMMENTS OF DISTRIBUTED ENERGY CONSUMER ADVOCATES ON THE NOTICE OF PROPOSED ACTION ADOPTING THE 2013 BUILDING ENERGY EFFICIENCY STANDARDS

Aram Shumavon
Distributed Energy Consumer Advocates
516 Whitewood Drive
San Rafael, CA 94903
Telephone: 213.784.2507
Email: a.shumavon@d-e-c-a.org

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Pursuant to the February 7, 2012 Noticed of Proposed Action Distributed Energy Consumer Advocates ("DECA") respectfully submits these comments on the proposed 2013 Building Energy Efficiency Standards. DECA looks forward to participating at the Commission in subsequent proceedings related to distributed generation and energy efficiency.

DECA is a customer choice focused, technology neutral nonprofit education and advocacy organization whose members consist of existing and potential residential and small commercial producer-consumers of electricity. DECA's members, who live throughout the state of California, represent a great opportunity to increase the efficacy of energy consumption focused policies by developing engaged producer-consumer of electricity throughout the state. DECA believes policy decisions that support customer choice around energy investments represent some of the best decisions that can be made in transforming both the consumption and production of energy.

I. Introduction

DECA limits their comments here to the subject areas of an expanded definition of "solar ready" and the consideration of performance-based tradeoffs between distributed generation and energy efficiency investments in new residential construction as part of the Alternative Calculation Method. Because DECA is a new and growing organization it could not actively participate in the workshops and related efforts that resulted in the proposed language for the 2013 Building Energy Efficiency Standards, however DECA fully expects to participate in subsequent record development opportunities for these and other subject areas in the future.

II. Discussion

A. DECA supports the solar ready language in the proposed 2013 Building Energy Efficiency Standards and urges the CEC to consider an expanded definition of "Solar Readiness" that includes readily accessible mounting hardware for solar-related technologies in solar zones.

DECA supports the Commission's job creation efforts and Governor Brown's Clean Energy Jobs Plan and believe that lowering the costs of residential energy infrastructure investment though reduced installation costs presents a great opportunity to encourage California's home owners to become energy producers. The 2013 Building Energy Efficiency Standards development process includes many important solar-related code improvements including roughed in conduit paths for roof-based systems and requirement for solar zones on roofs. Unfortunately 2013 cycle's record was developed around a concept of solar readiness that did not consider time-of-build installation of mounting hardware. DECA believes that by further reducing the costs of mounting solar thermal and photovoltaic systems to California's rooftops a

higher penetration rate of solar-based systems will be achieved, thereby resulting in a higher efficacy rate of the technologies than the CEC currently uses for "solar ready" and other calculations.

Similarly, DECA urges consideration of roughed in conduit paths for other distributed generation technologies including fuel cells and vehicle electrification. These steps will help ensure the Californian home is at the vanguard of energy planning as our electricity grid evolves over time.

B. The CEC should consider allowing market-based tradeoffs between distributed generation technologies and energy efficiency investments for new construction.

DECA understands that the Commission is considering tradeoffs between distributed generation technologies and energy efficiency investments for new construction as part of the Alternative Calculation Method. DECA supports this effort and looks forward to participating in the process. As the price of solar and other distributed generation technologies fall the ability of distributed generation to be cost effective in comparison to energy efficiency investments will increase. With appropriate limits this balance of distributed generation and energy efficiency investments can significantly increase the amount of distributed generation without losing key gains from energy efficiency. Facilitating these tradeoffs is also likely to increase the amount of distributed generation in the state.

While the consideration of market-based tradeoffs between energy efficiency and distributed generation is desirable, DECA recognizes that such tradeoffs leave some gains from energy efficiency “on the table”. Accordingly, DECA urges the Commission to consider the

costs for subsequent energy efficiency retrofits when balancing the ratios of those tradeoffs. An energy efficiency upgrade that cannot be retrofitted by a homeowner at a later date should not carry the same weight in any Alternative Calculation Method calculus as one that can be easily accomplished in the future.

III. Conclusion

DECA commends the efforts of the California Energy Commission and its staff in the production of the proposed 2013 Building Energy Efficiency Standards and in particular those regarding solar readiness. While the proposed standards certainly move California toward greater energy efficiency, DECA here highlights areas that are deserving of attention but were not adequately addressed in this policy cycle. DECA supports taking up these issues as soon as possible and look forward to participating in the Commission's appropriate proceedings on a forward going basis.

Respectfully submitted this 11th day of April, 2012.

By _____ */s/*
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