

Docket Optical System - Fwd: Comments for Docket #12-BSTD-01

From: Ron Yasny
To: Docket Optical System
Date: 3/20/2012 4:04 PM
Subject: Fwd: Comments for Docket #12-BSTD-01

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Please Docket.

>>> Avery Kintner <akintner@empoweredenergysolutions.com> 3/9/2012 5:02 PM >>>
 Good afternoon,

Please read the following comments into the Docket for Doc#12-BSTD-01 as part of the 45 Day Language hearings that will be held March 12, 13 and 14, 2012. These comments relate to Section 110.10(b)1A and propose to add two exceptions under this section:

EXCEPTION 2 to Section 110.10(b)1A: Single family homes may reduce the required solar zone or be exempt from mandated solar ready requirements required by this Section 110.10(b)1A in such cases as the builder/developer of the home demonstrates the projected need for solar for the home is less than the minimum requirement for the solar zone OR is designed to meet Tier 2 reach standards and attain net zero energy performance through other renewable energy technology.

Background: The proposed exemption will create flexibility within the code and for the market to embrace emerging technologies that provide for renewable generation or utilize integrated technologies that reduce the need for solar as a sole solution for meeting Building Energy Efficiency Standards and objectives. The proposed code only specifies the single solution of solar for renewable/energy efficient generation and in doing so, may limit the development of other solutions that may become viable and feasible in forthcoming years (provided there is a market opportunity for them). If all homes are required to be solar ready, the likelihood of other design approaches emerging may be minimized, creating an unfair competitive advantage for solar. Also, the proposed exemption provides builders, developers, designers and planning departments with leeway to embrace emerging technology as it is developed during the period of time this code will be in effect (in essence for the next five years).

EXCEPTION 3 to Section 110.10(b)1A: New single family homes may be exempt from mandated solar ready requirements in such cases that the homes are served through Community Scale Renewable Energy CSRE facilities built in conjunction with a planned development and located within the development site, with an area equal to the total number of homes serviced by such CSRE facilities multiplied by the minimum solar zone required by this Section 110.10(b)1A.

Background: This exception enables developers to embrace Community Scale Renewable Energy (CSRE) designs that address the State's objectives to increase local and distributed generation of renewable energy serving new developments. In addition, Virtual Net Metering (VNM) tariffs were first piloted under the CSI Multi-family Affordable Solar Housing Program ([MASH](#)) as a means of providing equal and direct benefits of the solar system to low income tenants in an affordable housing complex. In the current economy, these benefits should be extended to all property owners within a community, regardless of property ownership type. The Energy Division will issue Proposed Resolutions in Q1/Q2 of this year to expand VNM to multi-tenant/multiple meter properties. It is conceivable that VNM programs will be expanded to single family properties during the period of time this code will be in effect (in essence the next five years). In addition, emerging legislation (SB 843) and PIER funding efforts are supporting programs that will develop feasible CSRE strategies. Some of these strategies are already being piloted/deployed in other markets around the country. The current code should allow for design solutions that enable community based design and renewable energy solutions that don't depend on roof-top by roof-top solar installation.

These exceptions will be incredibly valuable to the development and building industry - enabling them to develop feasible, integrated community designs for future planned communities of all types.

Thank you for your consideration of these submitted comments for DOC #12-BSTD-01 and for reading them into the docket.

Avery

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