

DOCKETED

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Commissioner Andrew McAllister
California Energy Commission
Attention: Docket No. 15-BSTD-02
Dockets Office 1516 Ninth Street, MS-4
Sacramento, CA 95814

Subject: Comment on Docket #15-BSTD-02 2016 Buildings Standards Consideration of a Photovoltaic Compliance Credit

Commissioner McAllister:

As stakeholders interested in advancing California's energy efficiency goals, we applaud the California Energy Commission ("Commission") for continuing to set ambitious, achievable energy efficiency standards for residential homes in the 2016 update of Title 24 Building Energy Efficiency Standards. This successful outcome is the result of a thorough administrative process that provided substantial analysis and extensive opportunity for public review and comment. The purpose of this letter is to request that a comparable process be applied to the photovoltaic compliance credit ("PVCC") that is planned as a compliance option in the 2016 Title 24 update.

The concept of a PVCC, which would allow the builder to tradeoff efficiency measures by installing a solar photovoltaic system, has been briefly raised in several meetings related to the 2016 Title 24 rulemaking, but those discussions have never translated into a concrete proposal that stakeholders can analyze and offer comment on. The size of the PVCC and the methods that will be used in the PVCC calculation are important in determining how the new standards will work—whether they will encourage the maximum amount of energy efficiency that is technologically and economically feasible or fall short of that goal.

While Commission staff released a conceptual outline of the PVCC in March, neither the Commission-approved 45 day Title 24 language, nor the 15 day language specifically address a PVCC. Rather, it is our understanding that the PVCC will be unveiled as part of the Alternative Calculation Method (ACM) Residential Reference Manual in a process that affords the public little opportunity for constructive input. Many stakeholders have formally registered their concern to the Commission about the lack of transparency accorded to the development of this measure.

Given the potential size of the PVCC relative to the home energy budget established in Title 24 and the precedent it will set for incorporating distributed generation into building energy efficiency codes, we believe that a substantially more robust public process is in order.

Specifically, we ask that the Commission publish draft PVCC language accompanied by supportive analysis, hold a stakeholder workshop dedicated to the topic, and then provide opportunity for stakeholder written comment and language revision if warranted. This process should culminate in publication of a final proposal with adequate time for review and opportunity for public comment in advance of final approval by the Commission.

We believe that a transparent, comprehensive process on weighty policy proposals like the PVCC is consistent with the California Energy Commission's longstanding tradition of full disclosure and vigorous debate in the rulemaking process.

Sincerely,

North American Insulation Manufacturers Association
Natural Resources Defense Counsel
American Chemistry Council
Extruded Polystyrene Foam Association
Polyisocyanurate Insulation Manufacturers Association
Southern California Public Power Authority

Cc:

Chairman Robert Weisenmiller
Commissioner Karen Douglas
Commissioner David Hochschild
Commissioner Janea Scott