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ACC Comments - Staff Workshop on High Performance Envelope Measures

Additional submitted attachment is included below.

June 15, 2017

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 17-BSTD-01
American Chemistry Council Comments: Staff Workshop on High Performance Envelope and Domestic Hot Water Measures for the 2019 Residential Standards

Dear Commissioners:

The American Chemistry Council (ACC) applauds the California Energy Commission (CEC) for its leadership role in promoting building energy efficiency. ACC member companies manufacture the raw materials for a myriad of industries, including products used by the construction industry to meet today's advanced building energy efficiency standards. ACC has been involved in the development process for the 2019 Title 24 Energy Efficiency Standards (hereinafter "standards") and is generally supportive of the proposed standards.

We are writing today to express our support for ending the compliance credit tradeoff between installed photovoltaic (PV) systems and building thermal envelope requirements that was established by the 2016 standards as a one-time credit. A continuation of the 2016 tradeoff would run counter to the CEC's policy of investing in energy efficiency first followed by investments in renewable sources.[1] This "energy efficiency first" policy has become nationally recognized as the most cost-effective approach to constructing high-performance buildings. There are a number of considerations that support ending the PV trade off:

- Building insulation systems typically have a life span equal to that of the building. PV systems may need to be replaced at least once during a building's life.

- Many PV systems are installed on residential homes under leases where a third party, not the homeowner, owns the system. If the lease expires and the PV system is removed from the home, the homeowner will be left with a less energy efficient home that draws its energy from offsite resources.

- The use of building insulation within the envelope reduces the amount of energy required to heat and cool a home. An energy efficient building envelope allows a PV system to provide a greater percentage of a home's overall energy supply. Therefore, the standards should promote high levels of energy efficiency in order to increase the effectiveness of renewable energy requirements. This is especially true if California wants to meet its goal of zero net energy for all new residential construction by 2020.

[1] The 2003 California Energy Action Plan was approved by the California Energy Commission and most recently updated in 2008. The California Energy Action Plan articulated a "loading order" to address the state's future energy needs. The "loading order" established that the state would invest in energy efficiency, like the building envelope and other demand-side resources, followed by renewable sources.

In summary, we support ending the PV compliance credit tradeoff that was established by the 2016 standards. Thank you in advance for considering our views. If you have any questions or comments, please do not hesitate to contact me at 916-448-2581 or via email at Lindsay_Stovall@americanchemistry.com.

Regards,

Lindsay Stovall
Manager, State Affairs
American Chemistry Council