

DOCKETED

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Description:	N/A
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Organization:	Nehemiah Stone
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Comment Received From: Nehemiah Stone

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Docket Number: 17-BSTD-01

Accounting for natural gas impacts and costs

Additional submitted attachment is included below.



California Energy Commission
Building Standards Office
1516 Ninth St.
Sacramento, CA

**Re: 2019 Building Energy Efficiency Standards Development
Docket # 17-BSTD-01**

August 31, 2017

Dear Christopher Meyers,

Stone Energy Associates appreciates the opportunity to submit comments related to the development of the 2019 Building Energy Efficiency Standards.

First, I would like to reiterate my request that the cost of gas infrastructure be included in the cost effectiveness analyses. (Refer to my comments of April 21, 2017 for more details.) More and more data has been made available that supports the argument that failing to count the cost of bringing gas down the street (for new construction), bringing gas from the street to the building, installing gas meters, and plumbing the house or apartment building with gas piping, unfairly, and significantly, favors gas heating and water heating. Please see the data that Palo Alto recently prepared on the cost of gas infrastructure (Ken Rider is part of the group to which Palo Alto provide the data.).

On a second point, once again someone argued in the Standards update workshop, that increasing efficiency requirements through the Standards is contributing to making housing less affordable in California. At Payam's request, I am resubmitting the UCLA Anderson Forecast/PG&E report that disproves that claim. Perhaps more than any other market, housing costs are driven demand in the market – not the cost of the inputs. Data show that even when the cost of materials is increasing, home prices can decline if demand shrinks – and vice versa.

Third, the proposed Standards have an exception to the requirement for PV on single-family homes of three stories. There is no good reason to limit this exception to single-family homes, since roof area could be even restricted in multifamily buildings. I urge the CEC to include multifamily buildings in this exception.

Fourth, the Commission will need to perform an environmental impact analysis before adoption of the 2019 Standards next year. California has several non-attainment air quality districts for some of the by-products of burning natural gas. I urge the Commission to consider the air quality impacts of adopting a building standard that continues to promote the installation of natural gas appliances for end uses that electricity can serve, such as with heat pump water heaters, heat pumps for space conditioning, electric dryers, and induction cook stoves.

Finally, it would be helpful to know what the source is for the algorithms within CBECC for estimating the output of PV systems used to comply with the code. With the loss of the CEC's PV Calculator, other State agencies need to consider what tools are appropriate for use in the

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programs they operate and that offer incentives for PV that serves tenants. This question is not related to the CSI programs that offer direct incentives for PV, but rather to agencies like the Tax Credit Allocation Committee, which gives developers scoring points for competitive Low-Income Housing Tax Credits (LIHTCs), and allows property owners to adjust rents based on an accurate estimate of tenants' utility costs.

Again, thank you for the opportunity to comment, and thank you for considering them. Please let me know if any clarification is needed.

Sincerely,

A handwritten signature in blue ink that reads "Nehemiah Stone".

Nehemiah Stone

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