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Comments of the BayREN re Residential Solar PV, Storage, and Energy Design and Grid Integration for 2019 Standards

Additional submitted attachment is included below.

Bay Area communities working together for a sustainable energy future.

BAY AREA Regional Energy Network

September 8, 2017

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

Dear Commissioner McAllister,

The San Francisco Bay Area Regional Energy Network (BayREN) appreciates the opportunity to comment on the California Energy Commission (CEC)'s Staff Workshop on Residential Solar Photovoltaic, Storage, the Energy Design Rating and Grid Integration Impacts for the 2019 Building Energy Efficiency Standards. The BayREN is a regional program of the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) and is composed of public agencies in the nine-county Bay Area. It designs and implements effective energy savings programs, and draws on the expertise, experience, and proven track record of Bay Area local governments to develop and administer successful regional and local climate, resource, and sustainability programs. The BayREN provides the regional infrastructure needed for efficient delivery of energy efficiency programs throughout the Bay Area.

The BayREN supports the Commission's 2019 Standard Goals to align progressive energy and climate policies with grid and market realities. Expanding on the CEC's goal to "provide the tools for local governments to adopt ordinances to achieve ZNE through Part 11 Reach Codes, and other beyond code practices", the BayREN recommends the CEC:

- Develop, or collaborate with the Regional Energy Networks and/or the Statewide Codes & Standards team to develop, specialized tools focused on helping local governments understand how EDR targets can be established to simultaneously promote grid harmonization and advance local government energy and climate goals
- Provide specific methodologies for setting a value on the locational benefits to the grid from strategic deployment of distributed energy resources (DER)

Local Government Tools

The BayREN anticipates the need for guidance documents that help local governments understand how EDR targets can be set to benefit the grid while advancing local policy and climate goals. Other tools could include information on how efficiency measures and DERs (e.g. storage, EV charging stations) can be bundled to achieve EDR targets and deliver benefits to the grid.

Locational Benefits to the Grid

The BayREN sees value in the CEC sharing methodologies, and otherwise collaborating with local governments, for assessing site-specific locational benefits to the grid because of strategic deployment of DERs. This should specifically include financial benefits that could be included in cost-effectiveness studies required of local governments establishing reach codes and target EDRs lower than those required by Title 24. Also, the CEC in collaboration with the California ISO (CAISO) and the California Public Utilities Commission (CPUC) should engage with those local governments whose adoption of reach codes enabling strategic deployment of DERs is most critical for grid stability and harmonization.

We appreciate the opportunity to provide this input, and thank CEC for its careful consideration of BayREN's comments.

Respectfully Submitted,

Gerald L. Lahr
Assistant Director – Energy Programs