

DOCKETED

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Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
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Document Title:	City of Walnut Creek Comments Draft 2019 California Energy Code Title 24, Part 6
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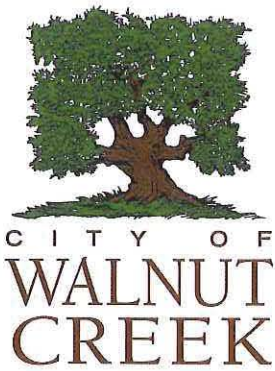
Comment Received From: City of Walnut Creek

Submitted On: 3/1/2018

Docket Number: 17-BSTD-02

Draft 2019 California Energy Code Title 24, Part 6

Additional submitted attachment is included below.



March 1, 2018

California Energy Commission
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Subject: Docket No. 17-BSTD-02

To Whom It May Concern:

The City of Walnut Creek is submitting the following public comment on the draft 2019 California Energy Code, formally known as Title 24 Part 6.

With the Energy Code becoming increasingly complex, the City's Building Division encourages the Commission to ensure that the Energy Code is more easily enforceable.

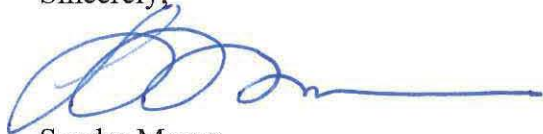
We support the Commission providing compliance pathways so that mandatory solar photovoltaic requirements for individual buildings can be met with community solar or a utility/community choice energy program purchase of 100% renewable energy when it is not feasible to have solar on site. The City joined community choice energy program MCE in late 2016, which gives utility customers the option to have their electricity sourced from 100% renewable sources. PG&E also offers an option for customers to receive electricity from 100% renewable sources. This compliance pathway would offer developers and residents more options and flexibility. For example, in residential areas where there are trees that would shade new construction, this would allow the City to still ensure greenhouse gas reductions.

However, this may mean that building owners or occupants would have to show documentation to the City or another enforcement agency that they are purchasing 100% renewable electricity throughout the building's life. If the Commission supports this compliance pathway, it should outline what would happen if the project stopped complying and failed to purchase 100% renewable electricity. To avoid Cities having to monitor the compliance of buildings on a regular basis, which would be an administrative burden, utilities and community choice energy programs may need to be able to designate properties or accounts that must use 100% renewable electricity to ensure long-term compliance.

The City adopted a Climate Action Plan in 2012 to reduce greenhouse gas emissions. We therefore support ensuring that compliance pathways are in place to allow for the installation of all electric appliances in new construction and building retrofits. An all-electric building

powered by electricity from a renewable source could greatly reduce or eliminate greenhouse gas emissions associated with building energy usage.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sandra Meyer', with a long horizontal line extending to the right.

Sandra Meyer

Director, Community and Economic Development Department