

DOCKETED

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*Comment Received From: Sustainable Silicon Valley
Submitted On: 6/29/2020
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Comments on the BUILD proposal

Additional submitted attachment is included below.



June 29, 2019

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California Energy Commission
1516 9th Street
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From: Bruce Naegel, 650 996 5793 bnaegel@sustainablesv.org

Dear Jordan,

Sustainable Silicon Valley (SSV)¹ respectfully submits these comments to the California Energy Commission (CEC) regarding the Joint Agency Workshop on Building Initiative for Low-Emissions Development (“BUILD Program”) to the CEC Building Initiative for Low-Emissions Development (Docket 20-CARB-01). The BUILD Program being commented on is part of SB 1477 (Stern) Chapter 378, Statutes of 2018). Comments on this bill have been requested by the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC). This is related to program participation requirements as mandated by Decision 19-01-011 and called for in the BUILD Implementation Plan.

SSV, a 501 (c3) non-profit, has served Silicon Valley for 20 years, bringing governments, companies, and Community Based Organizations (CBOs)s together towards solutions that contribute to a less polluted planet. The Multi Family Energy Utilization Initiative (MEUI) provided Multifamily housing owners and managers with increased access to energy savings programs. Energy audits in East Palo Alto, in conjunction with GRID Alternatives, identified candidates for GRID’s free solar installations. SSV was part of teams that helped get Silicon Valley Clean Energy started , which has provided its customers carbon neutral electricity since 2017. We have also participated in teams getting REACH codes passed in cities in Santa Clara and San Mateo Counties. These programs are lowering the carbon output of cities using these facilities

We appreciate the opportunity to comment on the BUILD program. This program can accelerate the move to carbon free buildings through electrification. To make it as effective as possible, please consider the following ideas.

¹ sustainablesv.org

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Simplicity (1 Page Application Form?)

The program needs to be easy to administer . We need to make this program easy, so contractors and property owners want to sign up. More signups more quickly mean more carbon reduced.

Training (Installation and Selling) (use SOMAH as a model for training delivery)

Contractors and builders are in general conservative. This transition to all-electric buildings will be new to them. They will need training assistance in adopting the all-electric home. This includes installation and sales training.

An example is Inductive cooking ² . People who try inductive cooking like it. Convincing them to try it is key. The Solar on Multifamily Affordable Housing (SOMAH) program)³ is a good example for a robust training program (both installation and selling).

Make all electric bills less for all-electric buildings

The BUILD program calls for the energy cost for the all-electric home to have energy bills equal to or less than the energy bills from a mixed fuel home. In many cases, the switch from gas to electricity is financially advantageous. There are exceptions in areas affected by thigh cost of electricity. One way to address this includes aggressive rate plans like TOU-D-Prime rates from SCE.⁴

Recommendations for more solar to lower the cost of electricity. Optimizing the solar to lower the cost of electricity for electric heat, hot water, and cooking. Regardless, we need to ensure the monthly cost is lower for the electricity customer.

Expanding CARE and FERA programs ⁵ (different income limits)

The California Rates for Energy Program (CARE) and the Family Electric Rate Adjustment(FERA) provide utility discounts to income qualified households. Households can also qualify for CARE if a member of that household participates in certain aid programs. One part of a rate program for low income can be expansion of the CARE and FERA programs to cover a wider population.

The CARE program also enables households to be part of these programs if a

² <https://www.reviewed.com/ovens/series/induction-cooking-101>

³ <https://calsomah.org>

⁴ <https://calsomah.org>

⁵ https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/longer-term-assistance/care/program-guidelines.page

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member of the household is enrolled in another aid program like the Supplemental Nutritional Assistance Program (SNAP) . Expanding the qualifications so more households can qualify can help ensure more households will be able to pay their energy bills.

Adopt Monthly and Yearly Metrics.

Summer and Winter show different energy consumption profile. This suggests multiple time frame measurements will be required (e.g. daily, monthly yearly)

Fund some Passive House structures as examples to drive Whole Building Requirements

The BUILD guidelines talk about working with the whole building, not just the appliances. This means making the building envelope less leaky. It also means ensuring toxic gases do not build up. The gold standard for this construction method is Passive House⁶. One way to incorporate Passive House techniques is to approve some buildings build this way. Then use this as a reference to see how close building constructed with expensive techniques and materials can approach Passive House performance. Passive House construction does cost more. If more contractors and engineers use this technique, the cost will go down (labor costs and material costs)

We thank you for this opportunity to comment on the BUILD program. We need to make this program successful to drive the good work cone in California to get us to a carbon neutral economy by 2045.

⁶ Passivehouse.com

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