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Sunrun Comments - 2022 Energy Code

Additional submitted attachment is included below.



July 28, 2020

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, California 95814-5512

Re: Sunrun Comments on the California Energy Commission Docket No. 19-BSTD-03

Dear Commissioners:

Sunrun, the nation's leading home solar, battery storage, and energy services company, supports the adoption of an all-electric code for residential and commercial buildings in the 2022 update of the Energy Code. Sunrun appreciates the California Energy Commission's (CEC) leadership in 2019, requiring PV solar on all newly-constructed homes. We are now uniquely poised to help support a transition to all-electric. Sunrun pioneered home solar service plans to make local clean energy more accessible to everyone for little to no upfront cost. By pairing solar with Sunrun's home battery solution, households, utilities, and the electric grid can benefit from affordable, resilient clean energy while reducing the state's reliance on natural gas.

Sunrun supports the CEC moving as quickly as possible to an all-electric code in order to promote affordability, health, and safety, and to meet California's climate goals. According to a 2019 Energy and Environmental Economics study, all-electric new construction is one of the most promising near-term opportunities for consumer cost savings and greenhouse gas (GHG) reduction. Rooftop solar and home storage can multiply benefits. As Southern California Edison states in its July 2nd letter on this issue, construction costs for all-electric new buildings are reduced by eliminating the cost of the gas infrastructure, and operating costs and GHG emissions can be further reduced with the installation of solar and energy storage systems. To date, Sunrun's systems have prevented GHG emissions totaling 5.2 million metric tons of carbon dioxide equivalent, or the equivalent of negating close to one million homes' electricity usage for the year, and saved Californians more than \$300 million.

Solar and home storage is critical to getting electrification right, especially for low-to-moderate income families and medically vulnerable individuals who face the highest energy and public health burdens from California's dependence on natural gas. Sunrun is ready to assist. Through leases, loans, and our nearly decade-long GRID Alternative's partnership, Sunrun can provide affordable access to more than 75% of Californians who want to go solar. By replacing natural gas in buildings - and taking natural gas plants offline via solar paired storage Virtual Power Plants - we can work together to reduce respiratory and cardiovascular diseases for vulnerable communities. Further, building more local Virtual Power Plants will play a critical role in keeping the lights on for vulnerable individuals as increasingly frequent extreme weather events and wildfires bring forced utility outages to millions across the state.



Finally, as the CEC looks ahead to 2022 standards, it should also ensure that the 2019 solar mandate is upheld. When the Commission adopted the 2019 Title 24 changes, in the agency's press release, Commissioner McAllister emphasized that "(t)he buildings that Californians buy and live in *will operate very efficiently while generating their own clean energy*. They will cost less to operate, have healthy indoor air and *provide a platform for 'smart' technologies* that will propel the state even further down the road to a low emissions future." (emphasis added) The Commission's accompanying fact sheet states, "Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. This will reduce greenhouse gas emissions by 700,000 metric tons over three years, equivalent to taking 115,000 fossil fuel cars off the road." In order to achieve these important and attainable benefits, the default option must be for developers to install solar on new homes. The Sacramento Municipal Utility District (SMUD) SolarShares program, which allows for offsite solar to meet the mandate, must not impede homeowners from installing solar and battery storage on their homes. To avoid an unintended and unfortunate precedent, SMUD customers, or any other utility customer, should have the option to opt out of the utility program and install rooftop solar at any time.

Sunrun appreciates the opportunity to weigh in and commends the CEC on its forward-looking leadership. Building electrification is a practical way for California to achieve its landmark 2045 climate change goals and meet the health, safety, and economic needs of Californians. By unequivocally setting an all-electric code in 2022, the Commission will give businesses certainty and avoid building out natural gas infrastructure that will become stranded in years to come. Sunrun looks forward to working with the Commission and leaders across California to make affordable, resilient, reliable clean energy a reality for all.

Sincerely,

A handwritten signature in black ink, reading "Anne Hoskins". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Anne Hoskins
Chief Policy Officer