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Support for CBECC Software Update

August 27, 2020

California Energy Commission Docket 19-BSTD-01
1516 Ninth Street
Sacramento, CA 95814

RE: Support for CBECC Software Update

Dear Commissioner McAllister & CEC Staff,

Riverland Homes, Inc. is aware of the proposed update to the California Building Energy Code Compliance Software (CBECC-Res 2019.1.3 Beta). We understand that the software update performs well and is free of any issues. We request that the software update is approved by August 31st so that the previously approved SMUD Neighborhood SolarShares (NSS) program can be available to builders and homeowners in the Sacramento region.

The Commission's adoption of a solar mandate for new low-rise residential dwellings represents a significant change to our state building code. Recognizing that in a state the size of California, one size does not fit all, the Commission worked with stakeholders to provide several compliance options, including the community solar option. The Commission thoroughly vetted and unanimously approved SMUD's Neighborhood SolarShares as a compliance option in February and the proposed update to the CBECC software is the last step in providing a community solar option in the Sacramento region.

The Commission's community solar option allows developers and builders to comply with the renewable energy mandate by using solar energy produced at an off-site facility. This facilitates the efficient and cost-effective construction of housing projects that provide the fastest increase in housing supply, including low-rise multifamily (where there is more than one unit located under the same area of roof), infill projects, and high-density single-family home projects.

For those types of homes, it may be impossible to find enough area onsite to install an adequate supply of solar panels. For other types of projects, providing an alternative option for compliance is key to ensuring that the projects are able to be completed and keep prices affordable for homebuyers. That's why there are a number of housing projects that are currently close to construction, including large subdivisions, infill and Accessory Dwelling Units (ADUs), and others, which have already expressed an interest in using Neighborhood SolarShares. Any delay in the update to the CBECC

software would be disruptive to these and other proposed projects and would be burdensome to an already tight housing market in the Sacramento region.

We appreciate that SMUD is committed to be a responsible administrator of a community solar program in the Sacramento area. Since approval at the February Business Meeting, SMUD has worked with the CEC, local governments, builders and customers to create a process for enrollment and inspection that is both customer friendly and 100% compliant with Title 24. Riverland Homes, Inc. strongly supports the proposed update to the CBECC software and respectfully requests that the Commission approve it no later than August 31st.

Sincerely,

Heather Westaby
Development Coordinator
Riverland Homes, Inc.