

DOCKETED

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My investigations reveal that the 2019 Building Code offers no savings for new home construction at all. In fact, it sets homeowners back tens of thousands of dollars in upfront costs with no payback possible. If the more costly “optimized solar PV” system is installed in “decarbonized homes” (all-electric homes), the upfront costs are even higher, which denies any hope of eventual cost recovery, even after a 30- or 40-year mortgage. By this point in time, a homeowner would have already gone through four different sets of inverters and made two sets of solar panel changeouts. The CEC's authors acknowledge that they did *not* account for these required ‘maintain, then replace’ cost elements of Solar PV in an all-electric house, “We do not include any difference in maintenance or removal costs.”

This begs the question, “Why not spare the homeowner from becoming a mini-utility operator in the first place?” Instead, insist the established utility operators (Sonoma Clean Power in Sonoma County and/or PG&E across the North Bay) provide more renewable energy through wind farms, further geothermal production (in the Geysers of Sonoma County), and larger fields of solar panels. Most homeowners would prefer to pay for energy services, not become renewable energy producers.

To upgrade to all-electric, the costs for an existing home will exceed \$100,000, as outlined in the attached table, Single Family Residence Costs_TABLE v.3_RKK.

With this in mind, I request that the 2019 Building Code be amended to remove the reach code requirement to force rooftop solar and eliminate the all-electric mandate. To ensure cost-effectiveness and also resiliency in the face of rotating blackouts and PSPSs, a mixed-fuel residence is optimal.

Thank you for your consideration,
....Rob

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