

**DOCKETED**

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*Comment Received From: Donald E Osborn  
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**Docket No 21-BSTD-01 – Comments 45-Day Language, 2022  
California Energy Code**

*Additional submitted attachment is included below.*



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July 7, 2021

Mr J. Andrew McAllister, Ph.D.  
Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Docket Unit, MS-4  
Submitted electronically to Docket 21-BSTD-01:

Re: Docket No. 21-BSTD-01 – Comments o 45-Day Language, 2022 California Energy Code

Dear Commissioner McAllister:

There have been some misconceptions raised about VNEM in California by the CBPA and others that, while I know you and the CEC staff understand these misconceptions, I would like to address based on our long, in-the-field experience with VNEM projects. Spectrum has completed or is in the process of completing some 44 VNEM projects for multi-family housing throughout California, about 80% of these are for affordable housing and the rest for market rate housing. With the new T-24 PV requirements we are seeing a substantial pick up in the market rate sector. VNEM is well established with the CPUC regulated utilities that represent most of the state as well as with a few of the “munis”. VNEM clearly reduces costs and improves benefits for the multi-family housing sector. It is well established and works well. There are no “costly 3<sup>rd</sup> Party VNEM solutions” needed to apply VNEM. VNEM’s implementation is broad, well established and operates well. There is NO lack of “practical experience” with VNEM. VNEM works and is providing significant savings to the customers who need access to solar benefits most. It is a strong part of the solar mix that is helping meet State Climate goals while providing real benefits to customers across the State. Spectrum, and the community of solar providers, already work with a wide range of multi-family providers, developers and builders and stand ready to continue to do so.

VNEM is central to meeting State goals in cost-effective ways and to making the benefits of solar more broadly available. VNEM applied to Solar+Storage will expand these benefits to both participants and non-participants alike.

Thank you for taking this information into consideration.

Sincerely,

Donald E. Osborn, President