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Support for PV + Storage Commercial and Multifamily Requirement

Additional submitted attachment is included below.



July 9, 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 on 45-Day Language, 2022 California Energy Code

Dear Commissioner McCallister.

Sun Light & Power (SLP) is a 45 year-old solar design & installation contractor with deep experience in solar thermal and photovoltaics. We appreciate the opportunity to offer the following comments for consideration in developing the 2022 Building Energy Efficiency Standards.

We wholeheartedly support the leadership of the CEC in mandating changes in our California Energy Code that will lead this state and this country towards reversing the Climate Change that is threatening all life on this planet. It is time for bold action to eliminate the burning of fossil fuels, and we strongly recommend that the Commission not embrace the timid suggestions of entities like the CBPA that will lead to half-hearted, ineffective stutter-steps.

Contrary to the claims of the CBPA, I am confident that the markets (heat pumps, batteries, and the like) will continue to respond robustly to market forces, as I have seen markets do many times over the last 45 years, when a clear mandate is provided. I also find many of CBPA's claims to be factually challenged; for example, their statement that "PV and battery storage do not necessarily work together unless you have an off-grid building" is nothing short of baffling, especially since I have successfully installed hundreds of grid-tied battery systems for over the past 20+ years. And their other comments about battery usage at night reveal a fundamental lack of understanding of how a battery system is designed to work.

With respect to VNEM, CBPA claims that VNEM is "developing", which is to me another baffling statement, given that SLP installed our first VNEM project in 2011, and has contracted for over 60 VNEM projects since then, totaling 3.7 MW. One of our first non-profit affordable housing VNEM customers, EAH Housing, has projected that their 5 MW of solar installations will save their low-income tenants over \$20 million in energy costs over the next 20 years, allowing EAH to plow those savings back into reduced rental costs, improved facilities and services like computer training for tenants.

I urge the Commission not to back off on this plan based on unsubstantiated fears promulgated by the CBPA. We need clear direction from our state institutions, and the CEC is poised to provide the leadership that this state needs.

Sincerely,

Gary T. Gerber, PE
CEO, Sun Light & Power