

DOCKETED

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Comments on 45-Day Language, 2022 CA Energy Code

Additional submitted attachment is included below.

Mr. J. Andrew McAllister, Ph.D.

Commissioner

California Energy Commission

1516 Ninth Street

Sacramento, CA 95814

July 12, 2021

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

Dear Commissioner McCallister,

The following comments are submitted on behalf of SimpliPhi Power, Inc. and the hundreds of solar + storage installers, commercial project developers, and distributors our company works with throughout California.

SimpliPhi Power designs and manufactures non-cobalt-based lithium ferrous phosphate batteries that are safe, efficient, and enduring energy storage and management solutions that seamlessly integrate any generation source – grid, solar, wind, generators.

Without energy storage, renewable generation is intermittent, but so too is the grid during catastrophic and emergency scenarios in which the centralized delivery of power breaks down.

Whether power outages are planned (PSPS events) or unplanned, the only way to create resilience for homes and businesses is to install distributed back-up energy storage + solar that is customer sited, in buildings and on rooftops. California continues to lose billions of dollars in a matter of weeks due to grid failure and power outages. Grid-tied distributed back-up energy storage + solar installed in apartment and multi-family buildings, homes, businesses, schools, and hospitals create energy security and economic stability, eliminate the 'duck-curve' due to overproduction of solar during the day (battery storage), optimize

grid functions and antiquated infrastructure, and save families and commercial property owners hundreds, sometimes thousands of dollars a month through TOU, peak shaving and demand charge management.

SimpliPhi Power can provide ample evidence across commercial project installations that demonstrate the 'value stack' of distributed customer-sited grid-tied storage + solar and the tangible economic benefits to building owners, their tenants and CA at large as distributed, customer-sited assets increase resilience and decrease CO2 and other GHG emissions in the built environment. We would welcome an opportunity to present case studies for your consideration in support of the proposed CEC Standards.

As a California manufacturer that founded in 2010, we have witnessed and have had to adapt and respond to changes in the regulatory landscape and have experienced firsthand the powerful impact mandates can have on the energy industry to incept change for the better. We applaud the CEC for developing the 2022 Building Energy Efficiency Standards and appreciate the opportunity to provide comment and support in favor of the Standards that would go into effect January 2023.

While there is concern about supply chain constraints that challenge the building industry's ability to meet the Energy Commissions estimated 100MW/400MWH of solar + storage annually, it is the vision behind mandates like this that serve as transformational signals to the market that actually drive the innovation, supply chain and increased production necessary to meet them.

As example, during 2020 and the COVID shutdowns, demand for SimpliPhi's grid-tied energy storage solutions across residential, multifamily, and commercial applications increased by 40%, as compared to 2019 sales. While challenging for our company and our network of global suppliers to meet this rapid increase in demand, it was the market signal we needed to aggressively bolster our supplier network and secure robust supply agreements and contracts. To date this year, we have experienced an additional 20% increase in market demand for grid-tied energy storage and management solutions and continue to work in lockstep with our suppliers as we expand our operations and throughput capacity.

Mandates serve to create concrete market signals that in turn support manufacturing operations and global supply chains to scale with reliable strategic forecasts adeptly and confidently, driving down costs and constraints. The Energy Commissions foresight in establishing the 2022 Building Energy Efficiency Standards will be a significant contributor to driving the market forward toward more rapid adoption, supporting California's manufacturing capacity, global supply chains and job growth in the renewable energy and



construction industries. Without clear signals from the market, the critical transition to a more sustainable portfolio of assets in the built environment will not occur.

Finally, it is critical that California enact policies and standards that reduce CO2 levels driving the extreme heat, drought, and wind - climate change - that are behind the planned power outages (PSPS) and unplanned grid failures, costing the state billions in losses annually. In 2020, it is estimated there were approximately 9,700 fires in California alone. Research indicates that the built environment is responsible for close to 33% of energy consumption and 30% of GHG emissions. The CEC mandate directly addresses these critical issues and provides a clear market signal for companies across the renewable and construction industries to build toward, leveraging innovation and supply chains with confidence.

Please feel free to reach out for more information and/or additional support from SimpliPhi Power and our network of installers, project developers, and distributors in California. Again, we can provide examples of grid-tied distributed commercial storage + solar installations with tangible economic and social benefits for your consideration.

Sincerely,

Catherine Von Burg

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