

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 20-DECARB-01 |
| Project Title: | Building Initiative for Low-Emissions Development (BUILD) Program |
| TN #: | 240905 |
| Document Title: | Redwood Energy Comments - Obligatory real-time data monitoring should be opt-in for additional incentives, or with commissioning |
| Description: | N/A |
| Filer: | System |
| Organization: | Redwood Energy |
| Submitter Role: | Public |
| Submission Date: | 12/13/2021 1:08:57 AM |
| Docketed Date: | 12/13/2021 |

Comment Received From: Redwood Energy
Submitted On: 12/13/2021
Docket Number: 20-DECARB-01

Obligatory real-time data monitoring should be opt-in for additional incentives, or with commissioning

Honorable CEC Commissioners and Staff,

I have been monitoring multifamily tenant energy use since 2006, including an EPIC study on ZNE affordable housing apartments for the last four years, and I am concerned that the current M&V proposal will not succeed as currently drafted. Specifically:

1. Making it an obligation of program participation will discourage many cautious AH developers
2. An opt-in program tied to additional rebates is a much more likely to be taken up by a significant subset of developers.
3. The technologies should be chosen ahead of time and be limited to what the Evaluator is sure they can succeed at analyzing--many different technologies will become unworkable for analysis. I suggest a Span or Koben smart panel.

Sincerely,
Sean