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CALBO Comments on Docket 21-Solar-01

Additional submitted attachment is included below.

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February 22, 2022

Subject: Docket 21- Solar- 01 CALBO's comments on CalAPP Preliminary Proposed Grant Guidelines

Dear California Energy Commissioners and Staff,

Thank you for the opportunity to provide public comment on the proposed grant guidelines for local building departments to adopt an automated solar permitting system through SolarAPP+.

California Building Officials (CALBO) is proud to represent the public servants and building officials in California's local jurisdictions who promote the highest regard for public safety in the built industry. CALBO members are primarily responsible for enforcing building code requirements in an estimated 95% of the buildings constructed in California. Our mission is to promote public health and safety in building construction through responsible legislation, education, and building code development. We ensure that proper public health and structural safety requirements, codes, and standards are adhered to within the built environment. We protect the citizens and the overall safety of the public.

CALBO looks forward to the opportunities the CalAPP program will provide in allowing local jurisdictions to voluntarily adopt an automated permitting system for residential solar energy systems.

After reviewing the proposed preliminary design program, CALBO would like to provide some recommendations for the guidelines.

The program should provide a source of funding for a variety of costs including:

- **Any new software costs:** One of the issues CALBO members have had when trying to adopt this technology has been the incompatibility of some local government software and a new software is needed for some jurisdictions to adopt this technology in a simple and easy manner. Resources to purchase and acquire new technology compatible with SolarAPP+ is necessary to incentivize local building departments to consider applying for grant awards associated with this technology.

- **Computer hardware and technology:** If SolarAPP+ is compatible on tablets and other mobile devices, jurisdictions should have the ability to purchase these technologies to make it easier to help complete the permit on site and further reduce staff costs on new permits.
- **Maintenance and required updates of the technology:** As this technology is relatively new, local building departments should be able to qualify for funding if needed maintenance is necessary with this technology.
- **Costs incurred before grant approval:** Some local jurisdictions may voluntarily select to begin the process to adopt SolarAPP+ before the grant money is awarded, however the current proposal only allows building departments to receive reimbursement after the grant is awarded. If jurisdictions are choosing to begin the process early, all costs associated with SolarAPP+ before the grant award should also be included in the reimbursement for the project. Local jurisdictions who take initiative should not be punished and lose out on valuable resources if the building department is looking to move forward quicker than expected.

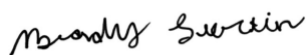
Streamlined and easy application process for Building Departments: Local building departments have several projects, permits, and requirements to comply with every year that already require significant time and paperwork. This process should be a simple and easy application for building officials and staff to complete and return in a quick and efficient manner.

Retroactive reimbursement for jurisdictions that have already adopted SolarAPP+: Some building departments have either adopted or are now using SolarAPP+ in their jurisdiction while others are currently in the process of piloting the technology. The grants should be available to jurisdictions who are early adopters of this technology and should be retroactive. After the COVID-19 pandemic, several local governments have had their budgets devastated due to loss revenue and therefore, grants should be available to these jurisdictions who have adopted the technology earlier than when the grant awards are opened for application.

Opportunities for more than one award in the future with any leftover money: CALBO understands that a maximum award is needed when rewarding jurisdictions funding sources from the state, however there should be an opportunity for future awards with any leftover money after a set number of grant awards has been rewarded. One requirement for building officials and their staff is continuing education requirements to maintain and renew their respective certifications. Local jurisdictions should be allowed to apply for awards that support future training of new staff and retraining opportunities for current staff on the use of SolarAPP+ technology especially as the developers improve the technology after feedback is provided by local jurisdictions.

Thank you all for the opportunity to bring forward our concerns about the proposed preliminary design for CalAPP, CALBO looks forward to the continued dialogue with the CEC on the proposal as it develops. Please do not hesitate to reach out with any questions or concerns.

Sincerely,



Brady Guertin
Public Affairs Manager