

**DOCKETED**

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| <b>Docket Number:</b>   | 22-BSTD-04                                                                          |
| <b>Project Title:</b>   | 2022 Energy Code Photovoltaic and Battery Storage Cost Effectiveness Determinations |
| <b>TN #:</b>            | 254850                                                                              |
| <b>Document Title:</b>  | BPi Comments - BENJAMIN APARTMENT BUILDING                                          |
| <b>Description:</b>     | N/A                                                                                 |
| <b>Filer:</b>           | System                                                                              |
| <b>Organization:</b>    | BPi                                                                                 |
| <b>Submitter Role:</b>  | Public                                                                              |
| <b>Submission Date:</b> | 3/5/2024 2:26:00 PM                                                                 |
| <b>Docketed Date:</b>   | 3/5/2024                                                                            |

*Comment Received From: BPI  
Submitted On: 3/5/2024  
Docket Number: 22-BSTD-04*

## **BPI - BENJAMIN APARTMENT BUILDING COMMENTS**

*Additional submitted attachment is included below.*

March 05, 2024  
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California Energy Commission  
715 P Street  
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**Re:** Benjamin Apartment Building Comments  
**Address:** 2525 Century Boulevard, Lodi, CA 9542

BPI reviewed the provided designs for the Benjamin apartment building to evaluate a potential project cost and general financial viability of similar projects.

The main cost drivers for the projects were determined to be:

1. Complexity of the interconnection.
  - a. The local utility does not permit master metering or Virtual net metering.
  - b. This means that smaller solar systems needed to be connected to each of the individual tenant meters.
  - c. Each connection needs an independent NGOM meter and blades disconnect for the local utility.
2. The scale of the project.
  - a. A 26.4 kW DC solar array is considered a very small commercial solar system.
  - b. Given the complexity of the system, residential installers would find the system difficult to execute and most commercial installers would view the system as too small to be viable.
  - c. A system more than 50 kW would be more appealing for commercial installers.
3. Interconnection fees.
  - a. The interconnection and permitting fees are higher than typical.

The main cost advantage for the system is the fact that it is a new construction.

1. If it is assumed that the building was designed solar ready, structurally, engineering fees are reduced drastically.
2. A C-10 contractor could permit this scope without an electrical engineer signing off since it is less than 100 kW.
3. If the general contractor installs conduit and pipe work required, the price can be reduced.
4. If the roofing company installing the new roof were contracted to incorporate solar anchors into the scope for the roofing installation, cost savings could be realized.

BPI would consider a price ranging from 4.8 \$/W to 5.8 \$/W reasonable depending on the level of solar readiness for the project. It is our opinion that a project like this one can be made viable with appropriate planning for a solar system.