

**DOCKETED**

<b>Docket Number:</b>	24-BSTD-01
<b>Project Title:</b>	2025 Energy Code Rulemaking
<b>TN #:</b>	256842
<b>Document Title:</b>	Bronte Payne, SunPower Comments - CFI Definition
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Bronte Payne, SunPower
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	6/13/2024 12:42:50 PM
<b>Docketed Date:</b>	6/13/2024

*Comment Received From: Bronte Payne, SunPower  
Submitted On: 6/13/2024  
Docket Number: 24-BSTD-01*

## **SunPower Comments - CFI Definition**

*Additional submitted attachment is included below.*

# SUNPOWER®

June 13, 2024

Commissioner Andrew McAllister  
California Energy Commission  
715 P Street  
Sacramento, California 95814

**RE: Docket 24-BSTD-01**

Dear Commissioner McAllister,

Thank you for the opportunity to provide comments on Docket No. 24-BSTD-01. SunPower is one of the nation's leading providers of residential and multifamily solar, battery storage, and energy services. SunPower currently serves more than 550,000 residential customers in the U.S. We provide solar and battery storage directly to customers and work with home builders and multifamily developers to install solar and storage in new construction projects.

I appreciate all of the work that the California Energy Commission staff have put into the 2025 Energy Code to date.

### *California Flexible Interconnection Definition*

In Appendix JA1-Definitions, the definition of the California Flexible Interconnection (CFI) only includes the specifications for CFI-1 and does not include the azimuth and tilt allowed under CFI-2. I propose the following changes to the definition to better align with the CFI options. Details about the options for modeling under the CFI can be found in JA11.2.2 and including the azimuth and tilts in the definition is duplicative.

CALIFORNIA FLEXIBLE INSTALLATION (CFI) is a set of criteria that allows a PV system to be modeled under the performance method without providing more specific orientations and tilts. ~~In order to meet the requirements of CFI, the PV system must be installed with an azimuth ranging from 150 to 270 degrees from true north, with all modules at the same tilt as the roof pitches between 0:12 and 7:12. There are three options for modeling under the CFI with azimuth and tile requirements in JA11.2.2.~~ Additionally, each system must also meet minimal shading criterion outlined in JA11.3

I also want to reiterate our support for a CFI-3 option for the 2025 Energy Code. This will help to reduce the cost of compliance with the code for homes that may need to be oriented in a specific direction or designed in specific ways to maximize the number of homes that can be built.

Respectfully,

Bronte Payne  
Senior Manager, Policy and Strategy  
SunPower