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*Comment Received From: SunPower  
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**SunPower Comments - T24 15-Day Language**

*Additional submitted attachment is included below.*



June 28, 2024

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

**RE: Docket No. 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. We appreciate the continued work of the California Energy Commission (CEC) staff on the 2025 Building Energy Efficiency Standards. We offer the following comments.

*Battery Energy Storage System (BESS) Definition*

In the definition of BESS in Joint Appendix JA1, it should be clarified that the systems do not need to provide backup or emergency power. There are BESS that have load shifting capabilities, which support the goals of the Building Energy Efficiency Standards but may not provide backup power.

*California Flexible Interconnection Definition*

We support the revised definition for California Flexible Installation (CFI) in Joint Appendix JA1. We continue to recommend that the CEC provide a CFI3 option for PV installed in the azimuth range between 90 to 300 degrees from true north and with all modules at the same tilt as the roof for pitches up to 8:12 to help reduce the cost of code compliance.

*Joint Appendix JA12*

We appreciate the work by CEC staff to improve the clarity of section JA12 and believe that the revision to the language succeeds in making the reference appendix easier to understand. We support the proposal to remove the labeling requirement for single-family residential buildings.

*Section 150.0(s)*

We support the revisions made to Section 150.0(s) to clarify the battery energy storage system ready requirement for single-family buildings. The added exception to Section 150.0(s) clarifies that the battery storage ready requirements do not need to be met where a battery energy storage system is installed. This exception makes this section of the code clearer for storage contractors, home builders, and Authority Having Jurisdictions.

We appreciate the opportunity to provide these comments on the 15-day language.

Respectfully,

Bronte Payne  
Senior Policy Manager, SunPower