

DOCKETED	
Docket Number:	25-BSTD-02
Project Title:	2025 Energy Code Photovoltaic and Battery Storage Cost-Effectiveness Determinations
TN #:	263078
Document Title:	Trinity Public Utility District_2025 PV Cost Effectiveness Staff Report_ Notice of Public Comments
Description:	The CEC seeks public comments on the updated cost-effectiveness analysis of the 2025 Energy Code solar photovoltaic requirements for Trinity Public Utility District, and recommendation for CEC determination discussed in the "2025 Energy Code Solar Photovoltaic Cost-Effectiveness Analysis for Trinity Public Utility District," which is available for review and comment in the 25-BSTD-02
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Submission Date:	5/13/2025 4:54:29 PM
Docketed Date:	5/13/2025

CALIFORNIA ENERGY COMMISSION

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CEC-057 (Revised 1/21)



Notice of Public Comment Period

Docket No. 25-BSTD-02

2025 Energy Code Solar Photovoltaic Cost-Effectiveness Analysis for Trinity Public Utility District

California Energy Commission (CEC) staff is soliciting public comment on staff's analysis of the cost-effectiveness of the 2025 Energy Code solar photovoltaic requirements for newly constructed single-family, nonresidential, and multifamily buildings in Trinity Public Utility District's service area. Staff's analysis, titled "2025 Energy Code Solar Photovoltaic Cost-Effectiveness Analysis for Trinity Public Utility District," is available for review and comment in the 25-BSTD-02 docket or at the following link:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=263060&DocumentContentId=99663>.

Staff is also soliciting public comment on staff's finding that:

- Since solar photovoltaic (PV) systems are not cost effective in Trinity Public Utility District's service area, then the 2025 Energy Code cost-effectiveness conclusions regarding battery energy storage systems would also not hold. The benefits of combined solar PV and battery energy storage systems would not occur, and the cost-effectiveness of the combination could not be shown.
- Since Trinity Public Utility District does not offer either a program where solar photovoltaic generation is compensated through virtual energy bill credits, or a community solar program, high-rise multifamily buildings in Trinity Public Utility District meet Exception 5 to Section 170.2(g) of the 2025 Energy Code contained in California Code of Regulations (CCR), Title 24, Part 6, high-rise multifamily solar PV requirements.

Background

The 2019 Energy Code, contained in the California Code of Regulations (CCR), Title 24, Part 6, with associated administrative regulations in Part 1, Chapter 10, went into effect on January 1, 2020, and included solar photovoltaic requirements for all newly constructed single-family and low-rise multifamily residential buildings in Section 150.1(c)14. The 2022 Energy Code, which went into effect on January 1, 2023, included solar photovoltaic and battery energy storage system requirements for specified newly constructed nonresidential, hotel/motel and high-rise multifamily buildings in Sections

140.10 and 170.2(g), with requirements for low-rise multifamily buildings moved to Section 170.2(f).

Consistent with Sections 10-109(k) and 10-110 of the 2019 and 2022 Energy Codes, Trinity Public Utility District submitted applications to the CEC requesting a determination that “the implementation of public agency rules regarding utility system costs and revenue requirements, compensation for customer-owned generation, or interconnection fees, causes the Commission’s cost-effectiveness conclusions, made pursuant to Public Resources Code 25402(b)(3), to not hold for particular buildings”.

On January 22, 2020, CEC determined that the solar photovoltaic requirement in the 2019 Energy Code, Section 150.1(c)14 did not apply to the Trinity Public Utility District service territory, pursuant to CCR, Title 24, Part 1, Chapter 10, Sections 10-109(k) and 10-110.

On February 15, 2023, CEC determined that the solar PV requirements in the 2022 Energy Code, Sections 150.1(c)14 and 170.2(f) did not apply to the Trinity Public Utility District service territory, pursuant to CCR, Title 24, Part 1, Chapter 10, Sections 10-109(k) and 10-110.

On September 13, 2023, CEC determined that the solar photovoltaic and battery energy storage system requirements in the 2022 Energy Code, Sections 140.10 and 170.2(g) did not apply to the Trinity Public Utility District service territory, pursuant to CCR, Title 24, Part 1, Chapter 10, Sections 10-109(k) and 10-110.

The 2025 Energy Code will go into effect on January 1, 2026, with solar photovoltaic and battery energy storage system requirements for specified newly constructed buildings in Sections 150.1(c)14, 140.10, 170.2(f) and 170.2(g). On its own motion, consistent with Section 10-109(k), staff has evaluated public agency rules of the Trinity Public Utility District in effect as of April 2025 to determine if the cost-effectiveness conclusions for the solar photovoltaic and/or battery energy storage system requirements of the 2025 Energy Code hold and to reconsider prior determinations.

Staff’s analysis based on Trinity Public Utility District’s revised rates, compensation, and charges for customer-owned generation, demonstrates that the cost-effectiveness conclusions for the 2025 Energy Code solar photovoltaic requirements do not hold for newly constructed single-family, nonresidential, and low-rise multifamily buildings in Trinity Public Utility District’s service area.

Staff also notes that Trinity Public Utility District does not offer either a program where solar photovoltaic generation is compensated through virtual energy bill credits, or a community solar program. Therefore, high-rise multifamily buildings in Trinity Public Utility District meet Exception 5 to Section 170.2(g) of the high-rise multifamily solar PV requirements.

Staff notes that the 2025 Energy Code also requires that newly constructed nonresidential and high-rise multifamily buildings required to have a solar photovoltaic system must also have a battery energy storage system. Since high-rise multifamily buildings are excepted from the 2025 Energy Code solar PV requirements, the 2025 Energy Code battery energy storage system requirements for high-rise multifamily buildings also do not apply in Trinity Public Utility District's service area. Also, since staff's analysis does not find solar photovoltaic systems to be cost effective in nonresidential buildings in Trinity Public Utility District's service area, the 2025 Energy Code cost-effectiveness conclusions regarding battery energy storage systems in nonresidential buildings would also not hold. The benefits of combined solar PV and battery energy storage systems would not occur and the cost-effectiveness of the combination could not be shown.

As a result of staff's analysis, staff recommends that the CEC determine that the Energy Code requirements for solar photovoltaic and battery energy storage do not apply to newly constructed buildings in Trinity Public Utility District's service area.

The CEC seeks public comments on the updated cost-effectiveness analysis of the 2025 Energy Code solar photovoltaic requirements for Trinity Public Utility District, and recommendation for CEC determination discussed in the "2025 Energy Code Solar Photovoltaic Cost-Effectiveness Analysis for Trinity Public Utility District," which is available for review and comment in the 25-BSTD-02 doct.

Public Comment

The CEC encourages use of its electronic commenting system. Visit the e-commenting page at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-BSTD-02>, which links to the comment page for this docket. Please enter your contact information, any organization name, and a comment title describing the subject of your comments. Comments may be included in the "Comment Text" box or attached as a downloadable, searchable document consistent with California Code of Regulations, Title 20, Section 1208.1. The maximum allowed file size is 10 MB.

Written comments may be submitted to the Docket Unit by 5:00 pm on May 26, 2025.

Please note that written comments, attachments, and associated content information (e.g., address, phone number, email address, etc.) will become part of the public record of this proceeding with access available via any internet search engine.

Written comments may also be submitted by email. Please include the docket number 25-BSTD-02 and "25-BSTD-02: Trinity Public Utility District PV Cost-Effectiveness (2025)" in the subject line and email to docket@energy.ca.gov.

A paper copy may be mailed to:

California Energy Commission
Docket Unit, MS-4
Re: Docket No. **25-BSTD-02**
715 P Street
Sacramento, CA 95814-5504

Public Adviser and Other CEC Contacts

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Direct general and technical subject inquiries at 916-896-4797 or by email at Title24@energy.ca.gov.

Availability of Documents

Supporting materials are available in the [2025 Energy Code Photovoltaic and Battery Storage Cost-Effectiveness Determinations](#) docket, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-BSTD-02>. When new information is posted, an email will be sent to those subscribed to the Building Energy Efficiency Standards list serve. Instructions are available at https://www.energy.ca.gov/listservers/index_cms.html.