

## DOCKETED

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## **Docket #15-BSTD-04 Recommendation to Maintain the Solar PV Compliance Credit as Currently Proposed**

August 20, 2015

Commissioner Andrew McAllister

California Energy Commission

1516 Ninth Street

Sacramento, Ca. 95814

RE: Docket #15-BSTD-04

Recommendation to Maintain the Solar PV Compliance Credit as Currently Proposed

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light-commercial construction. CBIA member-companies are responsible of over 90% of the new homes built in California each year.

With regards to the proposed solar PV compliance credit, please be advised that the comments of CBIA align with those comments already submitted by Matt Brost on behalf of SunPower Corporation. Simply put, CBIA feels that the ACM Solar Credit should not be diminished in any way and should remain in place throughout the 3-year 2016 California Triennial Code Cycle beginning on January 1, 2017 and concluding on December 31, 2019.

The 2020 Goal for Residential ZNE:

It goes without saying that, from a building standards perspective, 2020 is right around the corner. Zero Net Energy design will require a combination of BOTH high levels of energy efficiency coupled with on-site renewable energy generation. The 2016 Update of the Building Energy Efficiency Standards is the last opportunity for the CEC to incorporate into the standards those major features for which industry must become very familiar with prior to 2020. For this reason, it is imperative for the CEC to incorporate a robust compliance credit for solar as part of the 2016 Update of the standards.

While some of California's largest homebuilding companies have been incorporating rooftop solar as a standard feature on thousands of their new homes over the past three years, there are still hundreds of companies and thousands of contractors who have no experience whatsoever with solar. This has to change quickly and the availability of a solar PV compliance credit helps to address that issue.

Significant Need for CEC to Backfill Allowable Compliance Options:

As indicated in our testimony at the August 10th ACM workshop, the CEC has been moving compliance measures from the "compliance option" category to the "prescriptive measure" category for decades. This has been a standard administrative practice and has worked very well by providing industry and the enforcement community the opportunity to become familiar with new and emerging technologies as "compliance options" before adopting them as either "prescriptive measures" for use in generating the compliance budget or as "mandatory measures" which must be incorporated into each and every new home.

With the adoption of historically large increases in stringency over the last three updates, this administrative practice has severely depleted the "compliance option" category leaving industry with fewer and fewer design options available for consideration when complying with the standards. The inclusion of a solar PV compliance option will

allow for increased design flexibility, including the incorporation of higher levels of glazing (a highly marketable feature for many homebuyers).

**Proposals to Sunset and/or Restrict Usage of the Solar PV Compliance Credit:**

CBIA opposes efforts to sunset the PV Compliance Credit (prior to 2020). Doing this would send a message to industry that this is a short-term compliance measure and its use today will prompt the need for an “interim redesign” of their production-style product well in advance of the next major set of changes to the standards (2020). Under these circumstances, most builders would understandably shy away from using the PV compliance credit.

We also oppose other efforts to administratively restrict the usage of this compliance credit by incorporating caveats including but not limited to proposed requirements for HPA/HPW training if the credit is used or requiring the builder to “document hardship”. These and other related proposals create significant administrative hurdles that would, once again, seriously discourage the use of the solar PV compliance credit at a time when the CEC needs to be encouraging the effective installation of rooftop solar in the residential sector. They would also create a significant burden on the enforcement community who would be responsible for verifying compliance with these administrative measures.

**Maintaining the Integrity of the Building Envelope:**

As far back as the April 2014 CBIA/CEC Energy Forum, the CEC staff and their consultants have always made it very clear that industry would be prohibited from using the proposed PV Compliance Credit to “roll back” wall and ceiling insulation measures beyond those levels required by the 2013 energy standards. The building industry strongly supports this restriction.

Sincerely,

Robert E. Raymer, PE  
Senior Engineer/Technical Director  
California Building Industry Association