

DOCKETED

Docket Number:	15-BSTD-04
Project Title:	Residential and Nonresidential Software and related ACM Reference Manuals
TN #:	206311
Document Title:	Industry Stakeholder Comments re Proposed Photovoltaic Compliance Credit
Description:	N/A
Filer:	System
Organization:	Justin Koscher
Submitter Role:	Public
Submission Date:	10/8/2015 2:45:04 PM
Docketed Date:	10/8/2015

Comment Received From: Justin Koscher

Submitted On: 10/8/2015

Docket Number: 15-BSTD-04

Industry Stakeholder Comments re Proposed PVCC 10.8.15

Additional submitted attachment is included below.

October 8, 2015

Commissioner Andrew McAllister
California Energy Commission
Attention: Docket No. 15-BSTD-04
Dockets Office 1516 Ninth Street, MS-4
Sacramento CA 95814

RE: Photovoltaic Compliance Credit – Revised Draft 2016 Residential Alternative Calculation Manual Method

Commissioner McAllister:

The undersigned stakeholders applaud the California Energy Commission (CEC) for its leadership role in promoting building energy efficiency. The Title 24 Building Energy Efficiency Standards continue to move the state forward to the ambitious goal of zero net energy for new residential construction by 2020. This success is the result of an administrative process that has provided substantial technical analysis and extensive opportunity for public review and comment.

We write to request that a comparable process be implemented to review the photovoltaic compliance credit (PVCC) that is proposed as an option in the revised draft of the Residential Alternative Compliance Method Manual (ACM Manual). We also believe that any PVCC should sunset no later than January 1, 2019.

The proposed PVCC represents a substantive change to the 2016 Title 24 Standards that were approved by the CEC on June 10, 2015. Given the credit's potential impact on residential energy efficiency requirements, the PVCC should be reviewed and approved in a robust public and transparent process.

Unfortunately, the size and underlying assumptions of the PVCC were not made available for public review and comment until after the adoption hearing for the 2016 Title 24 Standards on June 10, 2015. Earlier discussions on the PVCC concept never materialized into a concrete proposal. In fact, the PVCC was not made available for public review until the draft ACM Manual was published for public comment on August 8, 2015. The background materials on the PVCC posted to the CEC website are dated August 10, 2015. Finally, the CEC staff first discussed the proposed PVCC in detail at a public workshop on August 10, 2015.

While the proposed PVCC resides in the ACM Manual, CEC staff presentations at the August and September workshops demonstrate that the credit is an integral part of the 2016 Title 24 Standards. The PVCC also represents a weighty policy decision and departure from the state's loading order and preference for energy-efficiency first investments as outlined in the California Energy Action Plan. As a result, the PVCC should be developed in a transparent process that is comparable to the Title 24 Standards development process.

Furthermore, any final PVCC should sunset no later than January 1, 2019. The added complexity of the 2016 Title 24 Standards and the need for compliance flexibility have been explained as motivating factors for the proposed PVCC. However, products for high-performance walls and attics are widely available in the California residential construction market today. Any knowledge gaps that currently exist will be addressed through CEC-sponsored, multi-year training program that is supported by various stakeholders and scheduled to launch in 2016. The availability of current technologies and technical assistance support a sunset of the PVCC no later than January 1, 2019.

A transparent, comprehensive process on significant policy proposals like the PVCC is consistent with the CEC's longstanding tradition of full disclosure and vigorous debate in the rulemaking process. We appreciate your continued responsiveness to our concerns.

Sincerely,

Center for the Polyurethanes Industry
Energy Efficient Codes Coalition
Extruded Polystyrene Foam Association
Foam Sheathing Committee
North American Insulation Manufacturers Association
Polyisocyanurate Insulation Manufacturers Association

Cc: Chairman Robert Weisenmiller
Commissioner Karen Douglas
Commissioner David Hochschild
Commissioner Janea Scott
Cliff Rechtschaffen, Office of the Governor
Martha Guzman-Aceves, Office of the Governor