

DOCKETED

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Support for Proposed PV Compliance Credit

October 13, 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 for over 90% of the new homes built in California each year.

With regards to the proposed solar PV compliance credit, please be advised that CBIA supports the recommendation from the California Building Officials (CALBO) to have the PV compliance credit remain in place for the entire 3-year duration of the 2016 Residential Building Energy Efficiency Standards (1/1/17 - 12/31/19). As indicated by CALBO, a planned revision of the standards "mid-cycle" creates a significant administrative hardship for all involved with the field implementation of the standards. This includes designers, energy consultants, builders, subcontractors, plan checkers and field inspectors.

It goes without saying that the last three updates to the standards (2010, 2014 and 2017) each represent a historically significant increase in energy efficiency levels prompting major changes to minimum design standards. Getting up to speed and effectively implementing these standards represents a significant challenge to industry and local code enforcement, even when changes are limited to the traditional triennial code cycle. Sun-setting the PV compliance credit, or any measure for that matter, would clearly create compliance confusion among those involved in the field application of the standards.

CBIA would also like to reiterate our support for the CEC staff recommendation to ramp up compliance training efforts for the new energy efficiency standards, with specific emphasis being placed on the high performance attic and advanced wall system measures. Each of these measures represents a significant departure from standard residential design practice utilized in California for the past 50-60 years. While these features are presently adopted as "prescriptive measures" in the standards, industry understands that the CEC may well be considering adopting one or both of them as mandatory provisions down the road. As such, industry needs to work with manufacturers and local code enforcement to integrate these features into common industry practice.

In closing, CBIA strongly supports the adoption of the PV Compliance Credit as proposed by staff and we look forward to working with staff and other interested parties on the effective implementation of the new standards.

Sincerely,

Robert E. Raymer, PE
Senior Engineer/Technical Director

