

DOCKETED

Docket Number:	15-BSTD-04
Project Title:	Residential and Nonresidential Software and related ACM Reference Manuals
TN #:	206392
Document Title:	KB Home Comments: Please Maintain the Solar Credit as Currently Proposed for the Entire 2016 Code Period
Description:	N/A
Filer:	System
Organization:	KB Home/Larry Gotlieb
Submitter Role:	Other Interested Person
Submission Date:	10/19/2015 11:28:15 AM
Docketed Date:	10/19/2015

Comment Received From: Larry Gotlieb

Submitted On: 10/19/2015

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Additional submitted attachment is included below.

October 19, 2015

Honorable Andrew McAllister
California Energy Commission
RE: Docket #15-BSTD-04

Subject: Please Maintain the Solar Credit as Currently Proposed for the Entire 2016 Code Period

Dear Commissioner McAllister:

Our company is one of the largest homebuilding firms in California. We strongly support the solar compliance credit currently being considered by the CEC for the 2016 Title 24 standards.

We are familiar with HPA and HPW construction techniques, as we have demonstrated in our model research homes. While we have reasonable familiarity with these techniques, cost and lack of skilled labor are obstacles to wide spread adoption. We need to use the compliance options that are best suited to each project. No single method will necessarily be the best in all circumstances. The solar code credit provides the necessary flexibility and choice to make the cost effective decisions necessary for long-term environmental and economic sustainability.

The NSHP is in the process of creating lasting market transformation as builders continue to learn, test, and adopt solar. For example, NSHP has made possible the 4,000 new solar-equipped homes that we have delivered in Southern California within the last four years. Yet, a large number of our homes in California are not solar homes because solar is still not affordable/sustainable in all of our communities. Greater affordability requires time to work with solar companies, trade partners, local governments and utilities to drive down cost, improve construction efficiencies, and streamline permitting processes.

With NSHP winding down, a meaningful solar credit in Title 24 will be essential to ensure progress in the improvement in, and reliance on solar as we approach 2020.

It should be noted that the most recent version of the International Energy Conservation Code (IECC), approved earlier this year, allows solar to be applied toward energy compliance. The newly adopted "performance method" gives builders full credit for solar generation to achieve lower HERS compliance scores. As the U.S. leader for energy code and renewables, California's decisions are important to what happens in the rest of the country. Alignment between Title 24 and IECC will lead to lower installed costs, lower risk, and faster market transformation.

California has ambitious plans for all residential low-rise homes to be net zero energy by 2020. The NSHP has been a great success in promoting solar by builders and laying the groundwork for widespread adoption. The NSHP alone cannot carry solar. The Title 24 code needs to provide a meaningful credit to give the building industry the ability to continue building new solar homes until the 2019 T24 code is implemented. If the credit were to sunset, or its value to be diminished, there would be a serious setback.

The solar credit would continue the California sound policy and practice founded by NSHP.

Sincerely yours,

Larry Gotlieb
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