

DOCKETED

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Comment Received From: Sarah

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Citadel Roofing & Solar's NSHP Guidebook 6th Edition Comments

Additional submitted attachment is included below.



California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dear Energy Commission,

As a solar contractor who has been closely involved in new construction residential solar systems and the NSHP program for almost 10 years, we appreciate your consideration of the following comments:

- 1) We would like the commission to consider paying out incentives for solar systems installed on model homes prior to the home receiving building final. The builder receives a solar final inspection and a temporary certificate of occupancy on model homes, however, the NSHP program does not currently accept these documents to pay the incentive. This leaves the builder (or more commonly the solar contractor) waiting 1-3 years to collect rebate money for solar systems installed on model homes.
- 2) With implementation of the new building and energy efficiency codes, builders will be able to utilize PV systems to achieve code compliance. However, we understand there has been discussion around not allowing NSHP incentives for solar systems used to achieve compliance. While we understand the initial intent of the NSHP program was to incentivize builders to build energy efficiency into their homes first, before adding solar, we do not believe it will undermine the original intent of the program by allowing builders to continue to take rebates when solar systems are used to achieve compliance. The building code has reached a point where the homes we are building today (and will continue to build in the future) will be far more energy efficient than they were 10 years ago. It is also very costly for builders to simply meet T24, let alone exceed T24 (which was the reasoning behind allowing Code Compliance rebates). We are hopeful the NSHP program will allow builders to continue to take part in the rebate program when solar is used to achieve code compliance.
- 3) With regard to leased solar systems, will the commission allow a leased solar system to be used to achieve code compliance? If so, what will be the requirements (if any) when the buyer has the right to remove that solar system at the end of the lease term?

Thank you for your consideration!

Sincerely,
Sarah Metcalfe
Director of New Construction Solar
Citadel Roofing & Solar