

## DOCKETED

<b>Docket Number:</b>	17-BSTD-01
<b>Project Title:</b>	2019 Building Energy Efficiency Standards PreRulemaking
<b>TN #:</b>	217573
<b>Document Title:</b>	Renewable Water Heating Model Ordinance Support from Green Cities California
<b>Description:</b>	N/A
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<b>Organization:</b>	Megan Jamison
<b>Submitter Role:</b>	Public
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*Comment Received From: Megan Jamison*

*Submitted On: 5/12/2017*

*Docket Number: 17-BSTD-01*

**Renewable Water Heating Model Ordinance Support from Green Cities California**

*Additional submitted attachment is included below.*



ACCELERATING

SUSTAINABILITY



**May 10, 2017**

**Mr. Christopher Meyer  
Building Standards Office  
California Energy Commission  
1516 Ninth St.  
Sacramento, CA 95814**

**Re: Support for the Renewable Water Heating Model Ordinance Proposal by NRDC**

Dear Mr. Meyer,

Green Cities California, supports the recommendations to include analysis of Renewable Water Heating along with the Model Solar Ordinance, as proposed by NRDC at the April 20 Zero Net Energy staff workshop, and submitted to [the docket on May 5, 2017](#) (Docket number 17-BSTD-01).

[Green Cities California](#) is a network of cities and counties that work together to create, adopt and share leading environmental policies and practices. Together, GCC members are a catalyst for bold, successful implementation of policies and initiatives that create vibrant, verdant, and healthy communities throughout California. GCC members include the City of Berkeley, City of Chula Vista, City of Hayward, City of Los Angeles, City of Manhattan Beach, Marin County, City of Palo Alto, City of Richmond, City of San Diego, City of San Francisco, City of San Jose, City of Santa Barbara, and the City of Santa Monica.

**We support CEC's initiative to develop a model solar photovoltaic (PV) ordinance, and encourage CEC to support the cost effectiveness analysis that provides an option for a "renewable water heating" requirement.** Water heating is one of the largest energy uses and source of greenhouse gas (GHG) emissions in the California residential sector. The proposed inclusion of renewable water heating requirements will enable California's communities to achieve larger greenhouse gas emissions reductions necessary to meet the State's AB32 goals.

GCC members advise that the CEC develop options that will help reduce GHGs from electricity consumption AND natural gas consumption for residential water and space heating. NRDC's "renewable water heating" model reach code proposal presents an important opportunity to reduce greenhouse gas emissions from water heating by approximately half, and achieve cost reductions over the life of the systems. The combination of heat pump water heaters and rooftop photovoltaic (PV) is more cost-effective due to the lower cost of onsite PV electricity generation relative to grid electricity. The CEC should recognize this cost-effectiveness in its comprehensive strategy to reduce utility costs to ratepayers.

Green Cities California

<http://www.greencitiescalifornia.org/>

GCC commends the California Energy Commission's commitment to reduce energy costs and environmental impacts of energy use - such as greenhouse gas emissions - while ensuring a safe, resilient, and reliable supply of energy. The inclusion of the cost effectiveness of distributed energy resources, including onsite solar PV, is a critical step in furthering mutual energy goals and provides a pathway to zero-net energy homes in California.

NRDC's proposed ordinance provides a framework that is cost-effective for homeowners, and represents an opportunity to reduce greenhouse gas emissions and pollution burdens impacting the health of California communities.

We strongly encourage the CEC to finalize and adopt NRDC's proposal to allow cities and developers in California to continue a pathway to zero net energy homes.

We appreciate the opportunity to provide this input to the CEC, and thank CEC for its careful consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Meg Williams Jamison', with a stylized flourish at the end.

Meg Williams Jamison  
Network Coordinator  
Green Cities California