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Steffes added comments on Aug 22nd Staff ZNE workshop

Additional submitted attachment is included below.



Commissioner Andrew McAllister and Energy Commission Staff California Energy Commission Dockets Office MS-4 Re: Docket No. 17-BSTD-01 1516 Ninth Street Sacramento, CA 95814-5512 docket@energy.ca.gov

September 1, 2017

RE: August 22nd Staff Workshop on Residential Solar PV, Storage, the Energy Design Rating and Grid Integration Impacts for the 2019 Building EE Standards - Solar/Storage and Energy Design Rating.

Dear Commissioner McAllister and Energy Commission Staff:

Steffes appreciates the opportunity to add additional comments to echo some points Docketed 9/1/17:

- Rachel Golden of Sierra Club (TN# 220991)
 - "There is growing consensus that California will not achieve its climate goals in a cost effective manner if we delay electrifying gas end uses in residential and commercial buildings"
- Pierre Delforge of NRDC (TN# 220987)
 - "An electric baseline matters not just for code compliance, it matters for programs that are based on the EDR score, such as the California Advanced Homes Programs (CAHP), which provides incentives to builders."

Our comments reflect our familiarity and experience in Hawaii

Hawaii is unique in many ways including having both an RPS (100% of its net electricity sales by December 31, 2045) and an Energy Efficiency Portfolio Standard (EEPS). As of January 2010 all NEW single-family dwellings were required to have a solar water heater- Act 204 now HRS 196-6.5. <u>http://www.capitol.hawaii.gov/hrscurrent/</u> http://www.capitol.hawaii.gov/hrscurrent/Vol03 Ch0121-0200D/HRS0196/HRS 0196-0006 0005.htm

Thought to be a legislative SWH "mandate", an enormous number of "variances" muddied the intent. <u>http://energy.hawaii.gov/resources/solar-water-heater-variance</u> Approximately 94% of which list "instantaneous gas" as the alternative water heater proposed.

Our point is that great care and thought must be given to the intent for "efficient" gas versus the alternative of electric resistance or heat pump water heaters or else we effectively embed GHG emissions for 12 or more years (the conservative life of a typical electric resistance water heater).

Again, we greatly appreciate the inclusion of water heater technologies in your decision making as well as their proven and yet undiscovered benefits for California RPS, EE, and GHG compliance.

Very truly yours,

/s/

Kelly Murphy