

DOCKETED

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City of Palo Alto comments on the 2019 CALGreen Voluntary Energy Efficiency Standards

Additional submitted attachment is included below.



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**City of Palo Alto Comments on the 2019 CALGreen Voluntary Energy Efficiency Standards
Docket 17-BSTD-01**

September 26, 2017

On August 30, 2017, the California Energy Commission (CEC) held a workshop to present the draft 2019 CALGreen Voluntary Energy Efficiency Standards. During the workshop, CEC staff listed seven goals of the 2019 Title 24 Building Energy Efficiency Standards, including “Contribute to State’s GHG reduction goals” (#3) and “Provide the tools for local governments to adopt ordinances to achieve ZNE through Part 11 Reach Codes, and other beyond code practices.” (#7)

The City of Palo Alto (Palo Alto) strongly supports leveraging California’s Building Energy Efficiency Standards to contribute to the state’s GHG reduction goals. Taking this one step further, Palo Alto recommends that the CEC support local jurisdictions in their GHG reduction efforts through the local green building code, by allowing the use of a voluntary societal cost of carbon (SCC) to encourage low carbon building design. For communities that are served by an electric utility that currently offers 100% carbon-neutral or renewable electric supply, a voluntary carbon adder in the local green building code would favor building electrification, an important strategy to meeting the state’s 2030 GHG reduction goals. The use of a voluntary carbon adder also complements the current cost-effectiveness methodology used in establishing the state’s Building Energy Efficiency standards, known as the Time Dependent Valuation (TDV) methodology. The TDV methodology does not fully account for the societal cost of carbon, and has also created a barrier to building electrification in prior Title 24 code cycles.

Given that there are many communities within California that have access to 100% carbon neutral or renewable energy supply, the CEC should defer to local governments the determination of the carbon intensity of the electricity supply and related enforcement issues.

Palo Alto further recommends that the CEC continue to solicit input from stakeholders to implement such a voluntary carbon adder in a manner that would not create additional compliance burdens. As an example, project developers should not need to make different modeling runs to demonstrate compliance with the State’s Building Energy Standards and the local green building code standard.

Thank you for the consideration of these comments.

Respectfully,

DocuSigned by:
Ed Suikada for James Keene 10/27/2017
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James Keene
City Manager, City of Palo Alto



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