

## DOCKETED

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<b>Project Title:</b>	2019 Building Energy Efficiency Standards PreRulemaking
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*Comment Received From: Bruce Ray*

*Submitted On: 10/20/2017*

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## **Comments of Johns Manville**

*Additional submitted attachment is included below.*



**Johns Manville**

*A Berkshire Hathaway Company*

**Bruce D. Ray**

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***UPLOADED ELECTRONICALLY***

October 20, 2017

Commissioner Andrew McAllister, Lead Commissioner  
California Energy Commission Staff

California Energy Commission  
Attn: Dockets Office, MS-4; Docket No. 17-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Docket No. 17-BSTD-01: Comments of Johns Manville**

Dear Commissioner McAllister and Energy Commission Staff:

Johns Manville (“JM”) welcomes the opportunity to provide these comments on the **2019 Building Energy Efficiency Standards Pre-Rulemaking** (Docket 17-BSTD-01). JM appreciates the Commission’s continuing leadership on energy efficiency issues in general, and building standards in particular.

JM urges the Commission to consider energy efficiency and rooftop solar energy as complementary under the right conditions and configurations. Increasing deployment of rooftop solar energy must be accompanied by Grid Harmonization Strategies (“GHSs”) in order to achieve maximum benefits to the grid, the environment, and the homeowner. GHSs are strategies that maximize self-utilization of the rooftop solar and minimize exports back to the grid. Examples of GHS include but are not limited to demand response and thermal storage, both of which can be enabled by energy efficiency. JM also urges the Commission to include in its Energy Design Rating software the ability to quantify non-battery energy storage.

Lead Commissioner McAllister, Energy Commission Staff

October 20, 2017

Page 2

Sincerely,

A handwritten signature in black ink that reads "Bruce D. Ray". The signature is written in a cursive style with a prominent "B" and "R".

Bruce D. Ray

Associate General Counsel,

Director of Governmental and Regulatory Affairs