

## DOCKETED

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| <b>Docket Number:</b>   | 17-BSTD-02   |
| <b>Project Title:</b>   | 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking   |
| <b>TN #:</b>            | 222678   |
| <b>Document Title:</b>  | Rmax Comments - Support of removal of PV Credit  |
| <b>Description:</b>     | Support of the removal of PV Credit, pursuit of solar in lieu of these advanced envelope measures as outlined in "2019 Title 24, Part 6 CASE Report - 2019-RES-ENV2-F" |
| <b>Filer:</b>           | System   |
| <b>Organization:</b>    | Rmax/Steve Dubin, CSI  |
| <b>Submitter Role:</b>  | Public   |
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*Comment Received From: Steve Dubin, CSI*

*Submitted On: 2/22/2018*

*Docket Number: 17-BSTD-02*

**Support of removal of PV Credit, pursuit of solar in lieu of these advanced envelope measures as outlined in “2019 Title 24, Part 6 CASE Report” 2019-RES-ENV2-F**

*Additional submitted attachment is included below.*



Docket No. 17-BSTD-02

Support of the removal of PV Credit, pursuit of solar in lieu of these advanced envelope measures as outlined in "2019 Title 24, Part 6 CASE Report – 2019-RES-ENV2-F"

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Commissioner McAllister and Title 24, Part 6 Team,

Rmax supports the CASE Report regarding the removal of photovoltaic (PV) generation that provides PV Credit, "...a way to give builders the opportunity to pursue solar in lieu of these advanced envelope measures..."

Solar panels and similar equipment are not equivalents or comparable to permanently installed advanced envelope measures such as insulation. PV and other solar energy generation equipment are temporary in nature. They are easily removable from the building, are sometimes not replaced at the end of usable life, increase inefficiencies and reduce effectiveness during life, and may be damaged in storms.

PV systems come with an additional cost burden to the homeowner due to maintenance, repair, and replacement.

Therefore, the California Energy Commission should not allow PV, an energy generation technology to offset envelope insulation, an energy reduction technology.

Rmax supports minimum requirements for PV installations but they should not be tied to elements in the building envelope. Therefore, Rmax supports the removal of the PV Credit as identified in the CASE Report.

Regards,

A blue ink signature of Michael Rhodes, consisting of a stylized 'M' followed by a horizontal line.

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A black ink signature of Steve Dubin, consisting of a stylized 'S' followed by a horizontal line.

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