

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222703
<b>Document Title:</b>	Pacific Gas and Electric Comments PG&E Recommended Revisions to 45-Day Language for Community Solar and Battery Storage
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Pacific Gas and Electric
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/23/2018 2:08:44 PM
<b>Docketed Date:</b>	2/23/2018

*Comment Received From: Pacific Gas and Electric*

*Submitted On: 2/23/2018*

*Docket Number: 17-BSTD-02*

**PG&E Recommended Revisions to 45-Day Language for Community Solar and Battery Storage**

*Additional submitted attachment is included below.*

February 26, 2018

**POSTED ELECTRONICALLY TO  
DOCKET 17-BTSD-02**California Energy Commission  
Dockets Office, MS-4  
Docket No. 17-BTSD-02  
1516 Ninth Street  
Sacramento, CA 95814-5512Re: Docket 17-BTSD-02: Pacific Gas and Electric Comments on 45-Day Language for Community  
Solar and Battery Storage

Pacific Gas and Electric (PG&E) appreciates the care that the California Energy Commission (CEC) has taken to design an alternative pathway for compliance with the residential solar requirements in the 2019 Title 24 standards that will be available if installing solar on the building site is not a viable option. Overall, the six criteria for the desired program are reasonable and we believe it could be possible to design a program that meets our current interpretation of these criteria.

With modest modifications, the Green Tariff Shared Renewables (GTSR) program<sup>1</sup> could support the CEC's objectives for the community solar option. However, changes to the GTSR program will require approval by the California Public Utilities Commission (CPUC). PG&E requests that if an appropriate program or tariff were designed in consultation with the CEC, and approved as necessary by the CPUC, that CEC would consider approving an application to use the GTSR program or tariff to comply with the community solar requirements. Relying on a revised GTSR program's review process to confirm the design and performance of community solar projects could help streamline the Title 24 compliance and enforcement process, thereby alleviating some burden from CEC and other jurisdictional authorities.

Regarding the code language in Title 24, Part 1 Section 10-115, PG&E seeks confirmation that the second criteria, Energy Performance, should be interpreted as follows: the electricity (kWh) delivered or assigned to the home are renewable, as would be the generation from a rooftop installation, and that the greenhouse gas (GHG) emissions are zero for all energy delivered or assigned to the home.

In addition to seeking clarification on the second criteria, PG&E suggests a clarification and edit to the third criteria. The wording should be modified to clarify that the energy savings benefits can be in the form of dedicated **or assigned** renewable energy, and will not require bill reductions.

Further, PG&E suggests edits to criteria five. There is definitional contradiction of "community shared solar" or "community shared battery storage system" and claiming that the community systems serve one building "exclusively." By definition, a shared system will serve more than one beneficiary. Deleting the word "exclusively" from the code language will serve to clarify this section's purpose.

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<sup>1</sup> The GTSR program allows customers to access renewable generation through offsite sources, including shared community renewables programs. More information on the program can be found at:  
<http://www.cpuc.ca.gov/General.aspx?id=12181>.

Finally, PG&E proposes revisions to the language surrounding the CEC's approval process. As mentioned above, efficiencies could be gained by streamlining approval for applications that are based on a CEC-approved programs or tariffs. We proposed language to clarify this intent.

Detailed revisions to the 45-Day Language for Title 24, Part 1, Section 10-115 as suggested above are shown below. **Insertions are underlined** and **deletions are struck**.

### **10-115 – COMMUNITY SHARED SOLAR ELECTRIC GENERATION SYSTEM OR COMMUNITY SHARED BATTERY STORAGE SYSTEM COMPLIANCE OPTION FOR ONSITE SOLAR ELECTRIC GENERATION OR BATTERY STORAGE REQUIREMENTS**

**3. Dedicated Building Energy Savings Benefits.** The community shared solar electric generation system and/or community shared battery storage system shall provide energy saving benefits directly to the building that would otherwise have been required to have an onsite solar electric generation system and/or battery storage system. The energy savings benefits shall be allocated from the total resource of the community shared solar electric generation system and/or community shared battery storage system in a manner demonstrated to be directly correlated to the energy performance specified by Section 10-115(a)2. The energy savings benefits allocated to the building shall be in the form of dedicated **or assigned** power, utility energy reduction credits, or payments for energy bill reductions resulting from the community shared solar electric generation system and/or community shared battery storage system.

**5. Additionality.** The community shared solar electric generation system and/or community shared battery storage system shall provide the energy savings benefits specified in Section 10-115(a)3 ~~exclusively~~ to the dedicated building. Those energy savings benefits shall in no way be attributed to other purposes or transferred to other buildings or property.

**6. (b) Application for Commission Approval.** Any entity may apply to the Commission for approval to administer a community shared solar electric generation or community shared battery storage system to provide partial or total compliance with the onsite solar electric generation system and/or battery storage system required by Section 150.1(b)2 of Title 24, California Code of Regulations, Part 6. The application shall demonstrate to the Commission's satisfaction that each of the requirements specified in Section 10-115(a)1-6 will be met and shall include detailed explanation of the actions that will be taken by the applicant to ensure that each requirement is met over the period of time specified in Section 10-115(a)4 for each building for which a partial or total offset is used to demonstrate compliance. All applicants have the burden of proof to establish that their application should be granted. The Commission shall have the authority to not approve any application that the Commission determines to be inconsistent with the requirements of Section 10-115. **The Commission leaves open the possibility that applications utilizing certain Commission-approved utility programs or tariffs may be granted automatic approval based on demonstration that the project is correctly utilizing such programs or tariffs to the Commission's satisfaction.**

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Thank you for the opportunity to comment on the 2019 Title 24 standards. We look forward to continued engagement with the CEC on this undertaking.

Sincerely,

/s/

Wm. Spencer Olinek