

DOCKETED

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Additional submitted attachment is included below.



March 27, 2018

RE: Docket number: 17-BSTD-02 Recommendation for Change to Storage Option

Commissioner McAllister:

I thank you for the opportunity to comment on Docket number: 17-BSTD-02. I recommend that the Storage Option be modified to support credits for high performance envelopes. The envelope first approach has been proven effective for quality, comfort and energy efficiency. The Passive House standard is required in many European countries and recognized as the leading standard to deliver realized energy savings. When using healthy durable low-carbon materials, high performance envelopes are the single most effective way to help California reach our AB32 goals and should be adopted in the 2019 Energy Efficiency codes.

Rob Hammon of BIRAenergy submitted similar longer and more detailed letter docketed on March 23, 2018 I quote the first part and refer you to his docket for more details

“For reasons discussed herein, the Commission should not adopt a Battery Storage Credit as currently proposed in the 2019 Energy Efficiency Code update. The proposed Storage Credit targeting batteries is driven by a few different factors, including that California has a mandate to install 1.3 GW of batteries as grid storage by 2020, that Batteries can theoretically help reduce and delay electricity peak demands, and that Storage Credit is desired by the building industry as an alternative to high-performance envelopes. These driving factors are all inappropriate reasons to push batteries into new homes, as discussed in some detail later in this letter. The result of a Storage Credit for Batteries will be a windfall for the battery market, increased costs to homebuyers to buy and maintain the batteries that are of no real value to the home occupants, and another three years delay in a real implementation of high performance envelopes in California.

The Commission should provide a Storage Credit for High Performance Envelopes with thermal-energy storage. A compliance credit for High Performance Envelopes would push the new construction market to build High Performance Envelopes. This would benefit builders, homebuyers, homeowners, and all the people of California by reducing energy use, energy bills, and greenhouse gas emissions, while increasing the longevity of the homes’ structure and the comfort of the occupants. While there is data to support the recommendations made, to keep this communication short and at a high level, it is not included here. I would be happy for the opportunity to discuss these recommendations at any convenient time and location”.

Respectfully Submitted,

Karl Johnson
CEO BeyondFire LLC

BeyondFire LLC

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