

DOCKETED

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Comment Received From: Jesse Feinberg

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Southern California Edison Company's Support for the California Energy Commission's 2019 Building Energy Efficiency Standards

Additional submitted attachment is included below.

May 4, 2018

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Support for the California Energy Commission's 2019 Building Energy Efficiency Standards: Commission Docket No. 17-BSTD-02

Dear Commissioners:

Southern California Edison ("SCE") would like to take this opportunity to express our support for the proposed 2019 Building Energy Efficiency Standards ("Title 24"). SCE appreciates the California Energy Commission's ("CEC") tremendous efforts and accomplishments to date on the Title 24 standards, and looks forward to continued support of those standards beyond adoption.

Notably, SCE supports the proposed prescriptive compliance option that allows for a domestic hot water-heating system baseline with electric heat pump water heaters, as it is an important step in supporting the state's greenhouse gas ("GHG") reduction goals and broadens customer choice. SCE also supports the proposed language which prescribes that new low-rise residential buildings have photovoltaic system sizing for all-electric homes that is sized the same as a mixed fuel home.

Furthermore, SCE agrees with the CEC that energy storage will play an important role in achieving California's Zero Net Energy policy objectives and supports the inclusion of energy storage as an option for achieving compliance credit in the 2019 Title 24 standards¹. We also applaud the CEC's recognition that a Time-of-Use rate is an appropriate signal for battery storage control. SCE is actively working on the integration of battery storage, as well as other distributed energy resources, with the electric grid, and we commend the CEC's efforts to support that integration.

SCE supports the CEC's overall approach to the proposed building standards and we are committed to GHG reduction through providing customers more

¹ We provide additional detailed recommendations on Appendix JA12 in the attached appendix.

technology choices and grid harmonization. In its “Clean Power and Electrification Pathway,” SCE has developed an integrated blueprint for California to reduce GHG that includes a combination of measures to produce the most cost-effective and feasible path forward. We appreciate the alignment between the 2019 Title 24 standards, the state’s, and SCE’s GHG reduction vision.

On behalf of SCE, I want to thank the CEC for its diligent and thoughtful approach to developing cost effective building standards that demonstrate dynamic steps toward achieving California’s GHG reduction goals. Please do not hesitate to contact me with any questions or to discuss further.

Very truly yours,

/s/

Ronald O. Nichols

Appendix

SCE herein provides comments on two items related to Appendix JA12 – Qualification Requirements for Battery Storage System.

JA12.2.3.1: In its February 21, 2018 comments, SCE requested that the CEC clarify how “Basic Control” language will apply to stand-alone battery systems. The 15-day language does not address stand-alone batteries, and SCE is concerned that such a configuration could lead to a stand-alone battery charging from the grid during off-peak hours and discharging to the grid for NEM credit purposes during peak hours. SCE urges the CEC to clarify if installed stand-alone battery systems will be able to provide compliance credit. If so, SCE recommends that these systems be appropriately covered in JA12 to further ensure grid harmonization.

JA12.2.3.3: In its February 21, 2018 comments, SCE suggested removing the words “Demand Response” and “TOU” from the qualifying language for “Advanced Demand Response Control.” After further consideration, SCE is recommending only deleting, “Demand Response” so that the term, “Advance Demand Response Control” is now, “Advanced Control.” The reason for this is that the term “Demand Response” is too restrictive per the definition in SECTION 100.1 – DEFINITIONS AND RULES OF CONSTRUCTION where demand response is defined as:

- Short-term changes in electricity usage by end-use customers from their normal consumption patterns. Demand response may be in response to:
 - a. changes in the price of electricity; or
 - b. participation in programs or services designed to modify electricity use
 - i. in response to wholesale market prices, or
 - ii. when system reliability is jeopardized

It is very likely that battery control will not necessarily be for “short term changes” but for extended periods of time. It is also likely that there may be other reasons for controlling batteries that are not listed in the definition of demand response that may need to be considered.