

DOCKETED

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Comment Received From: Karen Kristiansson

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Comments of the BayREN on 2019 Building Energy Efficiency Standards 15-day Express Terms

Additional submitted attachment is included below.



May 7, 2018

California Energy Commission
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Re: Docket No. 17-BSTD-02

Dear Commissioners and Staff,

The San Francisco Bay Area Regional Energy Network (BayREN) appreciates the opportunity to comment on the California Energy Commission (CEC)'s revised 15-day Express Terms for the 2019 Building Energy Efficiency Standards. The BayREN, a collaboration of the nine counties that make up the Bay Area, designs and implements effective energy savings programs on a regional level and draws on the expertise, experience, and proven track record of Bay Area local governments to develop and administer successful regional and local climate, resource, and sustainability programs. The BayREN provides the regional infrastructure needed for efficient delivery of energy efficiency programs throughout the Bay Area.

The BayREN believes that the 2019 update to Title 24 Part 6 needs to accommodate the use of efficient electric water heating technology in all building types under both the compliance path and performance path, in order to – at a minimum – provide a level playing field for renewably powered hot water heating compared to natural gas. As a result, the BayREN appreciates the CEC's changes to the proposed code language regarding domestic hot water heating systems for the prescriptive pathways for alterations in Section 150.2(b)1.H.iii and for systems serving multiple dwelling units in Section 150.1(c)8.C. We appreciate the integration of our comments on the 45-day language and the progress the proposed 2019 code updates have made in this direction.

As the Commission moves forward with the Compliance Manual, the Alternative Calculation Method, and compliance software, the BayREN requests that the Commission commit to ensuring these documents and rules provide a level playing field for efficient electric


thermal systems in performance based compliance, including individual unit-level heat pump water heaters and central systems serving multiple units, and also for efficient electric heat pump space heating. We understand that the latest version of the compliance software now includes an all-electric baseline for water heating for heat pump water heaters serving single units, and that a similar baseline is under development for central heat pump water heaters serving multiple units. Similar provisions for efficient electric space heating are also needed. Ensuring that all of these baselines and related provisions are fully developed and available for use on January 1, 2020 should be a priority.

The BayREN also remains concerned about the requirements in the 2019 code for community shared solar systems. While we support the Commission's intent to allow shared solar as an alternative to individual solar systems, the rigor of the requirements could make such shared systems difficult for local building departments to implement and enforce, particularly in developed urban areas. We therefore request that the CEC track and publicly report how and where shared systems for compliance with Title 24 are and are not developed, based upon applications received by the Commission. This reporting will help identify issues that may arise with implementation of the shared system compliance path, so that the Commission can determine whether changes may be needed to the requirements, either as a mid-cycle adjustment or as part of the 2022 code update.

Finally, the BayREN would like to reiterate a request made in our October 20, 2017 comments relative to labeling for residential lighting. To ensure that local building inspectors can enforce lighting requirements, we recommend that all light fixtures that are in Section 150.0(k) required to comply with Reference Joint Appendix JA8 also be required to be labeled as such (*i.e.*, JA8-2019 or JA8-2019-E).

We appreciate the opportunity to provide this input, and thank the CEC for its careful consideration of the BayREN's comments.

Respectfully Submitted,



Gerald L. Lahr

Assistant Director – Energy Programs