

## DOCKETED

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*Comment Received From: Francesca Wahl*

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**Tesla Comments - 15 day language**

*Additional submitted attachment is included below.*



May 7, 2018

Commissioner Andrew McAllister and Energy Commission Staff  
California Energy Commission  
Dockets Office  
Re: Docket No. 17-BSTD-02  
1516 Ninth Street  
Sacramento, CA 95814

RE: 15-Day Language for the Title 24 2019 Building Energy Efficiency Standards

Dear Commissioner McAllister and Energy Commission Staff:

I am writing on behalf of Tesla to share our support for the proposed revised express terms (15-day language) for the 2019 building standards.

Tesla appreciates the consideration by Energy Commission staff of our comments on the 45-day language, which focused primarily on outstanding technical issues for JA 11 (the qualification requirements for solar PV) and JA 12 (the qualification requirements for storage). Generally, Tesla supports the revised language for JA 11 including the refinements to the solar access verification with the insertion of the alternative compliance method. Furthermore, for JA 12, the 15-day language is appropriate with respect to most elements of the requirements and we strongly support the inclusion of the Alternative Control method, JA12.2.3.4, as a flexible control strategy that will help future proof the code as battery storage technology advances. Finally, the modifications reflected in the 15-day language regarding the additional flexibility for mandatory requirements for the demand response (DR) controls are aligned with Tesla's previous comments and will facilitate further innovation in this space.

While our previous comments regarding the control strategies and technical elements for JA 11 and 12 are still relevant, these modifications are not critical to moving forward with adopting the 15-day language. We, therefore, recommend continuing to monitor and potentially refine the technical elements of JA 11 and 12 as appropriate in future code cycles.

The 15-day language for JA 12 does include one addition that appears unnecessary to incorporate and that was not previously in the proposed 45-day language. This is the direct reference to "Net Energy Metering (NEM)" in section JA12.3, interconnection requirements. The addition of "NEM" in this section is somewhat redundant. Rule 21 already clearly references NEM. Therefore, by stating that a system "shall comply with all applicable requirements specified in Rule 21," NEM rules can be inferred. Furthermore, since "standalone storage" was struck from the eligibility list in JA 12 for the 15-day language, any storage system that is deployed under the residential code will be paired with a behind the meter solar system. By default, the majority of residential behind the meter solar systems interconnecting under Rule 21 will be NEM systems. At the same time, given the upcoming discussion of the NEM successor tariff by the Public Utilities Commission in 2019, which may alter the current NEM definition and may impact the operational mode of batteries, it is important to not further limit the flexibility of the code language to adapt to future changes by incorporating a potentially uncertain definition. Therefore, the previous language for JA12.3

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that references Rule 21, and thereby incorporates any current or future definition of NEM, is sufficient as the primary interconnection requirement.

Finally, there continues to be an opportunity for standalone storage systems to provide value under the code. The 15-day language strikes a “standalone system” from the eligibility requirements list. As discussed in our previous comments, during hours where utility scale renewables or community renewables systems are generating, the standalone battery can charge from grid-supplied solar during the day, and during the evening hours when loads would be met primarily with fossil generation, the battery can discharge to offset on-site load for the home and lower overall demand on the grid. In this scenario as well as the on-site solar plus storage scenario, the battery is providing emissions-reduction benefits and helping with grid harmonization efforts. Therefore, we recommend re-evaluating the opportunity for standalone storage systems under JA12 in future code cycles.

\* \* \*

Tesla appreciates the opportunity to submit comments in support of the 15-day language for the 2019 standards. The 2019 code will be able to capture the full value that solar PV paired with storage can provide to meet grid harmonization needs. Tesla looks forward to working with Energy Commission staff and other stakeholders on the Residential Compliance Manual process and the opportunity to utilize a grid harmonization credit for battery storage for both the efficiency and demand flexibility components of the Energy Design Rating (EDR).

Thank you for your leadership in helping achieve the state’s clean energy and greenhouse gas emissions goals.

Sincerely,

Francesca Wahl  
Sr. Policy Associate, Business Development and Policy