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Clarifying Solar Exemptions for Low-Rise and High-Rise Multifamily Properties

The California Housing Partnership Corporation assists nonprofit and government housing agencies to create and preserve housing affordable to low-income households, while providing leadership on housing preservation policy and funding. Many of these affordable housing organizations have extensive experience with energy efficiency and solar at multifamily residential properties.

We strongly support the flexibility that the California Energy Commission provided through exceptions for solar requirements at multifamily residential properties in the revised standards draft. However, we respectfully ask that the Commission clarify that the following exemptions apply to both low-rise and high-rise multifamily properties: (a) community solar and community battery storage exemption, and (b) reduction of solar PV requirement for projects paired with battery storage.

Through our work on the California Department of Community Services and Development's Low-Income Weatherization Program (LIWP) and the California Public Utilities Commission's new Solar On Multifamily Affordable Housing (SOMAH) program, we've learned that mid- and high-rise properties (common in dense and urban areas) often do not have enough roof space for on-site solar systems. Many of these properties with small roofs may be able to host on-site solar thermal, but may not have the physical space needed for on-site solar PV for common area and tenant serving uses.

Thank you for your time. We look forward to engaging with the Commission on this issue moving forward.