

**DOCKETED**

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	223841
<b>Document Title:</b>	Severin Borenstein Comments On Residential Rooftop Solar Mandate
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Severin Borenstein
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/18/2018 11:40:02 AM
<b>Docketed Date:</b>	6/18/2018

*Comment Received From: Severin Borenstein  
Submitted On: 6/18/2018  
Docket Number: 17-BSTD-02*

**On Residential Rooftop Solar Mandate**

*Additional submitted attachment is included below.*

**Scott, Janea@Energy**

---

**From:** Severin Borenstein <severinborenstein@berkeley.edu>  
**Sent:** Wednesday, May 09, 2018 9:08 AM  
**To:** Scott, Janea@Energy; McAllister, Andrew@Energy  
**Subject:** Fwd: residential rooftop solar mandate

Dear Commissioners Scott and McAllister:

I just sent this email to Chair Weisenmiller. I hope that the Commission will consider postponing this decision until independent energy policy analysts have an opportunity to weigh in.

Sincerely,  
Severin

----- Forwarded message -----

**From:** Severin Borenstein <[severinborenstein@berkeley.edu](mailto:severinborenstein@berkeley.edu)>  
**Date:** Wed, May 9, 2018 at 8:35 AM  
**Subject:** residential rooftop solar mandate  
**To:** Robert Weisenmiller <[Robert.Weisenmiller@energy.ca.gov](mailto:Robert.Weisenmiller@energy.ca.gov)>

Dear Commissioner Weisenmiller:

I just became aware in the last few days of the proposal in the new building energy efficiency standards rulemaking to mandate rooftop solar on all new residential buildings. I want to urge you not to adopt the standard. I, along with the vast majority of energy economist, believe that residential rooftop solar is a much more expensive way to move towards renewable energy than larger solar and wind installations. The savings calculated for the households are based on residential electricity rates that are far above the actual cost of providing incremental energy, so embody a large cross subsidy from other ratepayers. This would be a very expensive way to expand renewables and would not be a cost-effective practice that other states and countries could adopt to reduce their own greenhouse gas footprints.

Because I, and most other economists studying California's energy policy, just became aware of this proposal, we have not had time to participate in the policy process or write public documents on the subject. At the least, I would urge you to delay adopting such a rule until independent analysis from energy experts can be made part of the record.

I will add that I have no financial interest in any energy company. I am expressing my views purely in the interest of moving forward with California's fight against climate change in a cost-effective way that can be exported to other states and countries.

Sincerely,

Severin Borenstein

Severin Borenstein

**BerkeleyHaas**

Email: [severinborenstein@berkeley.edu](mailto:severinborenstein@berkeley.edu)

WWW: <http://faculty.haas.berkeley.edu/borenste>

Blog: <http://energyathaas.wordpress.com/>

Twitter: @BorensteinS

E.T. Grether Professor of Business Administration and Public Policy

Economic Analysis & Policy Group

Haas School of Business

University of California

Berkeley, CA 94720-1900

(p) [510-642-3689](tel:510-642-3689)

Research Associate, The Energy Institute at the Haas School of Business

312 Giannini Hall

University of California

Berkeley, CA 94720

<http://ei.haas.berkeley.edu>

Affiliated Professor, Department of Agricultural & Resource Economics

Affiliated Professor, Energy & Resources Group