

DOCKETED

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California Housing Partnership Comments on 2019 Building Energy Code Compliance Manuals and Documents

Additional submitted attachment is included below.



August 3, 2018

Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on the 2019 Building Energy Code Compliance Manuals and Documents

Dear Executive Director Bohan:

The California Housing Partnership is a leading expert on affordable housing policy and finance in California. We have assisted more than 100 nonprofit and government housing agencies assemble more than \$14 billion in funding to create and preserve more than 70,000 energy efficient homes affordable to low-income households throughout the state. We currently provide outreach and intake services for the California Department of Community Services and Development's Low-Income Weatherization Program (LIWP) for large multifamily properties and for the California Public Utilities Commission's new Solar on Multifamily Affordable Housing (SOMAH) program.

We have convened the Green Rental home Energy Efficiency Network (GREEN) since 2010 to collaboratively increase access to solar, energy efficiency and water conservation resources for low-income renters and affordable housing properties. GREEN includes more than 50 nonprofit and government housing organizations active throughout California with extensive experience with financing, installing and maintaining clean and efficient energy systems in their multifamily affordable residential properties.

California Housing Partnership strongly supports the flexibility that the California Energy Commission provides in the updated standards and compliance manuals. The exceptions and offsets for solar-ready and solar PV requirements at low-rise and high-rise properties strike an appropriate balance between advanced building designs and innovative energy policies, while acknowledging the need for flexibility to address site-specific conditions.

SAN FRANCISCO

369 Pine Street
Suite 300
San Francisco, CA 94104
Tel: (415) 433-6804
Fax: (415) 433-6805

LOS ANGELES

600 Wilshire Blvd.
Suite 890
Los Angeles, CA 90017
Tel: (213) 892-8775
Fax: (213) 892-8776

SACRAMENTO

333 University Avenue
Suite 200
Sacramento, CA 95825
Tel: (916) 683-1180
Fax: (916) 682-1194

SAN DIEGO

4231 Balboa Avenue
Suite 1018
San Diego, CA 92117
Tel: (858) 617-0579

We applaud the Commission's leadership and support its approach to solar-ready and solar PV requirements, exceptions and offsets that are sensitive to a broad range of building types. We have the following specific comments and recommendations on the proposed language:

1. Exceptions to Mandatory Requirements for Solar-Ready Buildings

The exceptions to the mandatory requirements for solar-ready buildings will allow low-rise and high-rise properties to reasonably reserve a space of the roof for a future solar PV system without installing panels, conduit, piping or mounting hardware. The five exceptions for multifamily properties (low-rise and high-rise) provide adequate flexibility for a broad range of buildings to be solar-ready without compromising the intent of the requirement. In particular, Exceptions 2 and 3 address roof size barriers while Exception 4 encourages energy efficiency and demand management solutions that can reduce overall energy loads and need for renewable energy generation.

2. Exceptions to Solar PV Requirements

The exceptions to the solar PV requirements will allow low-rise residential properties to adapt systems to site-specific conditions. The six exceptions provide flexibility without compromising the intent to require solar PV installations at these properties. In particular, Exception 6 allows a solar PV system to be reduced by 25 percent if it is paired with an on-site battery storage system. We support the 25 percent reduction but recommend that multifamily properties be allowed to have smaller battery storage systems with a total capacity no less than 4 kWh per dwelling unit. Single-family properties may rely on battery storage systems that have at least 7.5 kWh capacity, but multifamily dwellings generally use less energy per dwelling unit and should warrant smaller battery systems. Individual residential batteries like the sonnenBatterie can be as small as 4 kWh.

We also recommend a new exception for low-rise properties that are constructed through "sweat equity" programs because they may not be able to absorb the added cost of an on-site solar PV system. Exception 7 should read: *Any low-rise residential property constructed through a program requiring a minimum of 500 sweat equity hours and serving households at or below 80 percent of Area Median Income are exempt from the requirement to install solar PV. Residential units utilizing this exception must still comply with the solar-ready requirements of the code.*

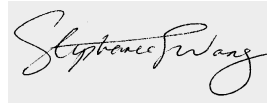
3. Community Shared Solar Electric Generation or Battery Storage System Offset

The community shared solar generation or battery storage offset can be a viable solution for properties that do not have adequate roof space or financial resources to install solar PV at the same site as the beneficiaries. By allowing low-rise residential properties to fully or partially offset the on-site solar PV requirements with off-site resources, this option carefully sets the stage for more Californians to benefit from distributed energy resources. We agree that an off-site system must provide energy savings benefits directly to the building that would have otherwise been required to have on-site solar PV, and that those benefits are equivalent to the reductions in energy consumption that would have been realized from an on-site system.

Please feel free to contact me if you have any questions about the above comments and recommendations. Thank you for your leadership and the opportunity to provide recommendations on the proposed 2019 Building Energy Efficiency Standards, Residential Compliance Manual, and Nonresidential Compliance Manual.

These comments and recommendations are also supported by nonprofit affordable housing organizations Self-Help Enterprises and Hollywood Community Housing Corporation.

Respectfully submitted,



/s/_Collin Tateishi

Collin Tateishi, Policy Manager
California Housing Partnership Corporation
600 Wilshire Blvd, Suite 890
Los Angeles, CA 90017
Telephone: 213-785-5734
Email: ctateishi@chpc.net

Stephanie Wang, Policy Director
California Housing Partnership Corporation
369 Pine Street, Suite 300
San Francisco, CA 94104
Telephone: 415-433-6804 x323
Email: swang@chpc.net