

DOCKETED

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Comment Received From: Thomas J. Collishaw
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Proposed 2019 Energy Code Compliance Manuals and Documents

Additional submitted attachment is included below.



A Nonprofit Housing and Community Development Organization

August 3, 2018

Mr. Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814

Re: Proposed 2019 Energy Code Compliance Manuals and Documents

Dear Mr. Bohan,

Self-Help Enterprises (SHE) appreciates the opportunity to comment on the proposed 2019 Energy Code Compliance Manuals and Documents. Self-Help Enterprises is a nationally recognized community development organization dedicated to working together with low-income families to build and sustain healthy homes and communities. In the last 52 years, SHE's efforts have touched the lives of over 55,000 families. As the pioneer and leading provider of mutual self-help housing in the United States, SHE's efforts today encompass a range of efforts to build better homes and communities for farmworkers and other hardworking families. SHE has helped more than 6,200 families to build their own homes, rehabilitated over 6,300 unsafe homes, developed over 1,408 units of affordable rental housing and has provided technical assistance for reliable access to safe drinking water and sanitary sewer infrastructures to more than 160 small communities.

We support the development of sustainable affordable housing and work to incorporate sustainability measures in housing when feasible and/or funded by available incentive programs. However, the 2019 Energy Code, as proposed, could cause many affordable homeownership projects to be infeasible, as low and very-low income homeowners have no ability to absorb the additional cost of solar PV installation. This challenge is compounded by the fact that many appraisals do not reflect the true cost of solar PV and other energy efficiency improvements, therefore allowing limited ability to finance the cost of mandated energy efficiency and/or generation requirements.

Programs utilizing the self-help housing model where low-income working families contribute labor to construct their homes and/or other programs utilizing volunteer sweat equity labor to offset the cost of housing should be exempt from this requirement.

Our recommendation is that the 2019 Energy Code include an additional exception for low-rise residential properties (which includes single-family housing) as follows:

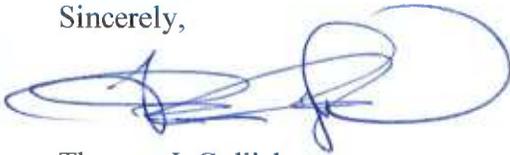
Exception 7 – Any low-rise residential property constructed through a program requiring a minimum of 500 sweat equity hours and serving households at or below 80% of Area Median Income (AMI) is exempt from the requirement to install solar PV. Residential units utilizing this exception must still comply with the “solar ready” requirements of the code.

Non-profit providers developing affordable homeownership housing through this model will continue to partner with programs such as SASH and LIWP to ensure access to solar PV on solar ready low-rise residential units.

This exception will ensure Californians have access to decent, safe affordable housing, including opportunities to end the cycle of poverty through homeownership.

Thank you again for the opportunity to comment on the proposed 2019 Energy Code. Should you have any questions regarding these comments or need additional information, please contact me at tomc@selfhelpenterprises.org or (559) 802-1620.

Sincerely,



Thomas J. Collishaw
President/CEO