

DOCKETED

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Docket 20-DECARB-01 on BUILD Program “ Comments on June 15, 2020 Workshop

Additional submitted attachment is included below.



June 29, 2020

California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Docket 20-DECARB-01 on BUILD Program – Comments on June 15, 2020 Workshop

Dear California Energy Commission,

Thank you for the opportunity to submit comments on the Building Initiative for Low-Emissions Development (BUILD) Program workshop on June 15, 2020. The California Solar & Storage Association's comments are as follows:

During the presentation, Geoffrey Dodson stated, "The source of the funds require that incentives be tied to expected avoided greenhouse gas, or GHG, emissions. Therefore, in addition to requiring all electric features, measures that contribute to better performance in GHG reductions will lead to better incentive totals." (See the 22:00 minute mark of the webcast recording.) Customer-sited PV solar, energy storage systems, and solar water heaters are key ways to allow for greater reductions in GHG. Incentives for these technologies through the BUILD program would encourage their adoption for the following reasons:

- The building energy efficiency standards do not require onsite PV solar for multifamily homes higher than three stories, some of which are low income. Incentives for onsite PV solar would encourage builders to add solar to those homes.
- The building standards require builders to install onsite PV solar to meet traditional electric loads on single family homes and low-rise multifamily homes. This is calculated as the expected usage from efficient new homes that are dual-fuel, with natural gas as the fuel source of heating and cooking. Many builders are unlikely to install additional solar and storage to power electrical heating and cooking appliances without incentives for this specific purpose.
- The building standards encourage, but do not mandate, energy storage. Incentives would encourage builders to add batteries.
- The building standards encourage, but do not mandate, solar water heaters. Incentives for the technology would encourage builders to include it in new homes.

Incentives for the above bullets are in line with SB 1477 (Stern), which directs the BUILD program to "provide incentives to eligible applicants for the deployment of near-zero-emission building technologies to significantly reduce the emissions of greenhouse gases from those buildings below the minimum projected emissions reductions that would otherwise be expected to result from the implementation of the prescriptive standards."



Thank you for the opportunity to submit comments.

Sincerely,

Benjamin Davis

Benjamin Davis
Policy Associate