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Support for CBECC Software Update

Additional submitted attachment is included below.

August 30, 2020

California Energy Commission Docket 19-BSTD-01
1516 Ninth Street
Sacramento, CA 95814

RE: Support for CBECC Software Update

Dear Commissioner McAllister & CEC Staff,

As a resident in the City of Sacramento, we are aware of the proposed update to the California Building Energy Code Compliance Software (CBECC-Res 2019.1.3 Beta). We understand that the software update performs well and is free of any issues, and we request that the update is approved by August 31st so that the previously approved SMUD Neighborhood SolarShares (NSS) program can be available to homeowners and builders in the Sacramento region. We are counting on the NSS program for the construction of an Accessory Dwelling Unit in our backyard.

The Commission's adoption of a solar mandate for new low-rise residential dwellings represents a significant change to our state building code. I see this as an important positive step for the state but one that needs to allow different compliance options for different cases of homebuilding. The Commission thoroughly vetted and unanimously approved SMUD's Neighborhood SolarShares as a compliance option in February and the proposed update to the CBECC software is the last step in providing a community solar option in the Sacramento region.

The community solar option allows developers and builders to comply with the renewable energy mandate by using solar energy produced at an off-site facility. This is especially important to infill projects and high-density single-family home projects, where existing conditions might not allow for efficient implementation of solar power generation onsite. Finding enough area and avoiding shade are two main challenges in those cases. *Our building project is one example – an Accessory Dwelling Unit of under 500 square feet of living space. We are close to downtown Sacramento, with a small lot that is common in the neighborhood. With large existing trees, which are also very common in Sacramento, there was not enough reasonably unshaded space to add solar panels. Local and national solar installers we reached out to were reluctant to provide a design, knowing the location was not ideal, and the space limited. The SMUD Neighborhood SolarShares is the most feasible alternative that makes sense for our project.* Any delay in the update to the CBECC software would be disruptive to these and other proposed projects and would be burdensome to an already tight housing market in the Sacramento region.

We appreciate that SMUD is committed to be a responsible administrator of a community solar program in the Sacramento area, working well with the CEC, local governments, builders, and customers (us). I also very much appreciate the Commission's efforts to make these needed modifications to the energy mandate. My family strongly supports the proposed update to the CBECC software and respectfully requests that the Commission approve it no later than August 31st.

Sincerely,

Sayo Chaoka