

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-01
<b>Project Title:</b>	2019 Alternative Calculation Method Reference Manuals and Compliance Software Tools
<b>TN #:</b>	234540
<b>Document Title:</b>	SMUD Comments - Support for CBECC Software Update
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	SMUD/Ed Hamzawi
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	8/31/2020 2:31:40 PM
<b>Docketed Date:</b>	8/31/2020

*Comment Received From: Ed Hamzawi*  
*Submitted On: 8/31/2020*  
*Docket Number: 19-BSTD-01*

## **Support for CBECC Software Update**

*Additional submitted attachment is included below.*



August 24, 2020

Chron#: AES20-030

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

RE: Support for CBECC Software Update

Dear Commissioner McAllister & Staff,

The Sacramento Municipal Utility District (SMUD) has reviewed the proposed update to the California Building Energy Code Compliance Software (CBECC-Res 2019.1.3 Beta) in relation to the technical, performance, and process requirements needed to administer SMUD's Neighborhood SolarShares (NSS) Program as a community shared solar system that can be used to meet the requirements of section 150.1(b)(1) of the 2019 Energy Code. The CEC approved our application to administer the NSS Program as a community shared solar system at the February 20, 2020 business meeting.

We are pleased to report that the proposed update performed as expected for all scenarios, including single-family, multi-family and accessory dwelling units and we support its formal adoption and approval by the executive director by delegated authority as indicated in the Notice of Availability (Docket #19-BTSD-01) at the close of the public review period.

SMUD staff have worked closely and collaboratively with CEC staff over the past few months to ensure accuracy of the system information and coordinate on the process documentation and reporting needed to verify and ensure that the compliance results and forms meet all requirements of the Code. We would like to thank the Commissioners and staff, especially Bill Pennington and his team, for their efforts to create a stable and reliable software update that will allow builders and SMUD customers to enroll in this first-of-its kind community solar option in California. This milestone will help to further our common goals to provide flexibility and additional options to meet our aggressive decarbonization goals while also supporting the building community in addressing California's housing crisis.

On behalf of our SMUD team, I respectfully request that the proposed update to the CBECC software be approved as planned. We are currently working with a number of builders, developers, and individual customers who are ready and waiting to be able to complete their application packages and move forward with their permitting process with a number of building departments to utilize the NSS option to meet their solar compliance requirements. We thank the Commission for its diligent and competent work on this project and look forward to collaborating in the future on strategies to reduce carbon emissions and tackle climate change.

Sincerely,

A handwritten signature in black ink that reads "Ed Hamzawi".

Ed Hamzawi  
Director, Advanced Energy Solutions  
Sacramento Municipal Utility District (SMUD)