

DOCKETED

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*Comment Received From: California Solar & Storage Association
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CALSSA's response to Town of Truckee's petition to solar PV requirement

Additional submitted attachment is included below.



September 21, 2020

Subject: 19-BSTD-12 – CALSSA’s response to Town of Truckee’s petition to solar PV requirement

California Energy Commission:

Thank you for the opportunity to submit comments on Truckee’s petition that parcels with high snow loads be exempt from the new home solar mandate. We commend the Energy Commission for providing a fair summary of issues and proposing a thoughtful and detailed solution.

We believe that the solar mandate should apply to new homes in areas with heavy snowfall. For instances in which the solar system and roof cannot be designed to accommodate heavy snow loads, we believe the parcel should receive an exemption. However, we understand that builders and solar installers can design most all solar systems and roofs to accommodate the heavy snow loads in Truckee and counties in the Sierras.

We agree with the Commission’s assessment that builders can take the following steps to design solar systems that meet snow load structural requirements: (1) employ three-rail mounting techniques, (2) pitch roof slopes, and (3) modify the roof design and location.

We are concerned that the determination of whether the above steps will allow the solar system to meet the snow load structural requirements will be burdensome to solar installers, builders, and regulators, resulting in parcels receiving an undue exemption. For example, Truckee reports their maximum ground snow load to be 483 psf. To determine that a parcel with 483 psf ground snow load is exempt from the new home solar mandate, the builder and building department would need to determine that none of the following scenarios are possible: (A) a roof slope of at least 40 degrees with an unobstructed slippery surface, (B) a roof slope of at least 50 degrees with full upwind exposure, (C) a roof slope of at least 55 degrees with partial upwind exposure, and (D) adding a third rail to one of the first three scenarios to allow a lower sloped roof.

To prevent parcels from receiving exemptions from the solar mandate when the system and roof could be designed in a way to accommodate the snow load, if the Energy Commission grants an exemption today, we request the Commission reevaluate the efficacy of this exemption when adopting the 2022 building standards to ensure that only parcels truly unable to have solar receive the exemption.

Additionally, the Town of Truckee’s letter to the Energy Commission on June 1, 2020 states that they are aware of only one PV module that has a rated three-rail system (REC N-Peak). We would like to share with the Commission LG’s 3-rail mounting solution. Please see the letter from LG accompanying this submission to the docket.



Lastly, we ask the Energy Commission to confirm with Truckee that the ground snow loads reported by Truckee are accurate. We understand that the psf of the ground snow loads for individual parcels comes from a 1973 report that may have used a now out-of-date methodology. While the Sierras can receive some of the highest snowfalls in the country, the snow loads reported by Truckee are extraordinarily high. (483 psf in Truckee, 563 psf in Sierra County, 545 psf in Placer County, and 543 psf in Nevada County. For the snow load of Truckee's individual parcels, see: <https://www.townoftruckee.com/government/community-development/building-and-safety/snow-load-design>.) While they may be accurate, we ask the Commission to look into the matter further.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Benjamin Davis".

Benjamin Davis
Policy Associate
California Solar & Storage Association