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*Comment Received From: CA Solar & Storage Association
Submitted On: 6/21/2021
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CALSSA's comments on the 45-day language for the 2022 Building Energy Efficiency Standards

Additional submitted attachment is included below.



June 21, 2021

Subject: Docket 21-BSTD-01 – CALSSA’s comments on the 45-day language for the 2022 Building Energy Efficiency Standards

Dear California Energy Commissioners and staff:

Thank you for the opportunity to submit comments on the 45-day language for the 2022 Building Energy Efficiency Standards. We applaud the Energy Commission’s leadership to require commercial buildings include solar and storage, ensure energy storage systems can be easily added to homes in the future, and encourage buildings to include solar hot water systems and other electrification technologies. We also thank the Commission for working with the solar industry to clarify and strengthen the requirements throughout the code development process. Our remaining suggestions for the standards language pertain to the community solar compliance option:

Section 10-115(a)(3): The 45-day draft has removed the “equivalent” benefits language in the 2019 standards. Now, this section reads that the energy bill savings from the community solar program must be greater than the cost of the program to the building. Theoretically, a community solar program with a 20-year net benefit to the building of one dollar would satisfy this requirement. We believe that customers enrolled in community solar programs should receive significant savings and suggest the Commission amend the language accordingly.

Section 10-115(a)(4): We support the Commission adding a requirement to the community solar compliance option that allows building owners to unenroll in the community solar program by installing on-site solar. The section now states, “At the time of interconnection of that on-site solar electric generation system, all costs associated in the community shared solar and/or battery storage system shall cease.” We assume this provision prevents community solar program administrators from charging properties unenrollment fees, and we request the Commission provide clarification in the building standards. Without a provision that explicitly prohibits unenrollment fees, we are concerned that high fees could prevent properties from unenrolling and installing on-site solar.

Section 10-115(a)(6): We ask the Commission to amend the locational requirement for the community solar compliance option. One tenet of community solar is that the installations be located in the communities they serve. At the Commission Business meetings on SMUD’s SolarShares program in November 2019 and February 2020, the Commissioners expressed concern over the lack of locational requirements in Section 10-115, especially because faraway community solar systems would preclude resiliency benefits.

The 45-day language has updated Section 10-115(a)(6) to read, “The community shared solar electric generation system and/or community shared battery storage system shall be located on a distribution system of the load serving entity providing service to the-participating buildings.” Our reading of this language would allow a home in Eureka, in PG&E’s northern electric service territory, to be enrolled in a community solar farm 450 miles away in Santa



Maria, in PG&E's southern territory. To ensure that community solar installations are located in the community of the homes they serve, we ask the Commission to amend the language in this section to read, "The community shared solar electric generation system and/or community shared battery storage system shall be located on the distribution system of the participating buildings."

We also recognize the Commission may find our proposed language restrictive as the Commission wants the compliance option to spur community solar programs across the state. We would be happy to work with the Commission to develop other language options that would bring the community solar installations closer to the properties they serve and create resiliency and other local benefits. One option is to require the community solar projects to be in the same distribution planning area (DPA) for the utility.

Section 10-115(b)(3): We support the Commission adding a requirement that "applications from public agencies shall be submitted to the Energy Commission only after public review through at least one public meeting." We suggest that all utilities, whether public or private, that submit community solar applications should be required to allow for public review via public meetings, and ask the Commission to consider adding language accordingly.

Thank you for consideration of our comments.

Sincerely,

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

Benjamin Davis
Policy Associate