

DOCKETED

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CCSA Comments on 15-Day Express Terms 2022 Energy Code

Additional submitted attachment is included below.



July 28, 2021

California Energy Commission
Docket 19-BSTD-01
1516 9th Street
Sacramento, CA 95814

Subject: Docket 21-BSTD-01 –Comments of the Coalition for Community Solar Access re: Section 10-115 of the Proposed Revisions to the California Building Energy Efficiency Standards, 2022 Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6

The Coalition for Community Solar Access (CCSA) appreciates the opportunity to comment on the California Energy Commission’s (Commission’s, or CEC’s) Proposed Revisions to the California Building Energy Efficiency Standards, 2022 Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1, Chapter 10, and Part 6 (2022 California Energy Code or Title 24), filed on July 14, 2021: 15-Day Express Terms 2022 Energy Code – Residential and Nonresidential.

For reference, CCSA filed comments in partnership with the Solar Energy Industries Association (SEIA) on March 9, 2021¹, and then, independently, on May 5, 2021², and again on June 21, 2021³, in response to the draft 2022 Building Energy Efficiency Standards. As with those prior comments, CCSA’s focus here is on the Section 10-115 components of the 2022 California Energy Code, and specifically the ability for community shared solar electric generation systems (and/or battery storage systems) to play a role in supporting compliance that is otherwise required by Section 150.1(b)1 (and potentially other sections considered in the current proposal).

Section 10-115 – Community Shared Solar Electric Generation System or Community Shared Battery Storage System Compliance Option for On-Site Electric Generation or Battery Storage Requirements

CCSA supports the proposed revisions in the 15-Day Express Terms and applauds Commission Staff for it’s ongoing effort to balance stakeholder input while enabling the opportunity for community solar to serve as a viable compliance option in meeting California’s energy policy goals. CCSA provides only one brief comment here for consideration.

- **Establishment of Community Solar Tariffs and Programs** – CCSA echoes comments its provided in multiple filings associated with the building code that without a viable community solar tariff in investor-owned utility (IOU) territory community shared solar will not be able to support Title 24 compliance for the vast majority of new construction occurring in California. As it stands, CCSA has filed – at the California Public Utilities Commission - a proposal for the establishment of a community solar program in R.20-08-020 (hereafter the “net metering revisit” proceeding);

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237103&DocumentContentId=70279>

² <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237670&DocumentContentId=70895>

³ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=238392&DocumentContentId=71700>

as well as a Petition for Modification to provide rate stability in the Enhanced Community Renewables (ECR) program (part of the Green Tariff Shared Renewable program). Without a viable, scalable community solar program the building code updates provide a policy that has minimal opportunity to be leveraged in practice and which therefore undermines the ability to meet the state's energy policy goals.

CCSA appreciates the ongoing opportunities to comment on the proposed revisions to the 2022 California Energy Code draft. That said, California first needs viable community solar programs that can actually serve the majority of the California's new construction mandates, particularly as it moves toward an electrified economy.

/s/ Charlie Coggeshall
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Coalition for Community Solar Access