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CBIA Comments on Part 6 - Solar and Battery Storage - SUPPORT

Additional submitted attachment is included below.

May 13, 2024

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: **Docket No. 24-BSTD-01**
2025 Update to the Building Energy Efficiency Standards
Residential Solar & Battery Storage, Non-Residential Solar Measures
Comments by: **California Building Industry Association**

Dear Commissioner McAllister

Introduction

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member companies involved in residential and light commercial construction. CBIA member companies are responsible for over 85% of the new single-family homes built in California annually.

Residential Solar and Battery Storage

CBIA strongly supports the May 10, 2024, comments submitted by SUNPOWER regarding the proposed changes to Joint Appendix JA 12 and the California Flexible Installation (CFI-3) measure.

Non-Residential Solar

The California Public Utilities Commission (CPUC) approved a modified proposed decision (R20-08-020) in December, which effectively eliminated virtual net energy metering benefits for multi-tenant non-residential buildings. Recognizing that this decision negatively affects the cost-effectiveness of solar PV for many of these non-residential occupancies, the CEC Staff and the solar industry developed a partial “exception” to the PV mandate that accounts for this unfortunate change in photovoltaic energy benefits.

CBIA supports the staff's proposed language in Section 140.10(a) Exception 5. However, given the updated language's technical complexity, CBIA urges the CEC to publish several compliant examples of this Exception in the Energy Conservation Manual (ECM) that can be expected to be encountered in the field. This would greatly reduce confusion in the field as we transition to the new energy efficiency standards.

Lastly, CBIA will continue to support efforts to have the CPUC revisit this issue and provide appropriate virtual net energy benefits to multi-tenant, non-residential buildings with solar.