

CITY AND COUNTY OF SAN FRANCISCO



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August 29, 2007

DOCKET	
07-SB-1	
DATE	AUG 29 2007
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California Energy Commission
Dockets Office
Re: Docket No. 07-SB-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Comments on Senate Bill 1 Eligibility Requirements Staff Report

The City and County of San Francisco (CCSF or the City) is pleased to submit the attached comments on Senate Bill 1 Eligibility Requirements Staff Report (CEC-400-2007-14), dated August 2007.

San Francisco's goal is to be a leader in promoting the use of clean and renewable energy sources, and San Francisco has prioritized the intelligent use of energy in planning for the future. To that end, the City has established a policy goal to have 100 percent of its power supplied by clean, renewable sources. In addition to promoting the use of clean and renewable energy, the City also promotes partnerships with developers and power suppliers to increase the supply of renewable energy in the Bay Area. The City is actively supporting and encouraging the deployment of solar systems. Over 3 MW of solar are now installed in the City, including a 675 kW installation on the Moscone Convention Center. As part of our Environmental Justice program, 55 PV systems have been installed in the Bayview Hunters Point and Potrero Hill neighborhoods of San Francisco with additional systems to be installed within the next few months. These solar energy systems also help the City to reduce its reliance on fossil-fueled power plants and cut down on greenhouse gases that contribute to global warming.

The following comments address the residential requirements in the Staff Report:

1. The goal of the California Solar Initiative (CSI) is to maximize the amount of solar installations and support the State's carbon emissions reduction targets. The program incentives must also support energy efficiency and therefore, should be aligned to reward more efficient homes that require fewer kW of capacity to meet the home's energy needs. Large, over-

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sized homes do not do not support the goal of reducing emission. It matters little that such large homes are “energy efficient” because they still emit much larger quantities of carbon than smaller homes. State incentive funds should not be used to support solar on these over-sized homes. In order to have sufficient funding to allow large numbers of small homes to participate, CCSF recommends that a higher incentive and rebate should be provided for the first kW of capacity and a declining incentive amount should be provided for each subsequent kW of installed capacity. This approach will reward small, energy efficient homes.

2. For the energy efficiency requirements, several ideas were raised at the workshop, ranging from a simple checklist of prescriptive items to a full-blown home performance test. CCSF agrees with California Building Performance Contractors Association (CBPCA) that an important objective for the CSI should be to have trained professionals make on-site assessments and recommend site-specific measures. However, we acknowledge that this recommendation would be difficult to implement due to the lack of trained personnel. CCSF therefore recommends a phased approach, either based on the year of the program or the amount of kW of installed capacity. For example:

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Program Year	Amount of Installed Capacity	Assessment or Audit Requirements
2008 or	1 st kW	Simple checklist audit by the solar installer
2009 or	2 nd kW	HERS audit with no minimum efficiency rating required
2010 or	3 rd kW	HERS with a minimum efficiency rating required
2011 or	4 th Kw	A full Home Performance Test

Very truly yours,

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