



October 31, 2013

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 06-NSHP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512



Re: New Solar Homes Partnership Guidebook: Comments of San Diego Gas & Electric on Staff Draft of the New Solar Homes Partnership Guidebook

San Diego Gas & Electric (SDG&E) submits the following comment to address the considered staff draft of the New Solar Homes Partnership Guidebook.

**Energy Efficiency – Code Compliant Tier:**

The top issue for Residential New Construction is that we will be moving from a percent better than code incentive criteria to a CA HERS Index criteria. In general, this lines up with percent better than code, but will vary significantly from climate zone to climate zone. The CEC and CPUC have been pushing very hard the last few weeks to maintain as much cohesion between the two programs as possible. SDG&E strongly recommends that the NSHP follows suit with transitioning to the use of the CA HERS Index for eligibility. CAHP is eyeing a score of 84 as our target for 2014, which corresponds to an average of 15-20% better than 2013 code. If NSHP wants to create a “code compliant” tier, perhaps we could consider a score of around 95.

However, the creation of a code compliant tier may undercut efforts by several IOU programs to push the market and related industries to higher levels of cost effective energy efficiency in new construction.

Sincerely,

SDG&E’s New Solar Home Partnership (NSHP) Program Administrators

Cc: Le-Quyen Nguyen