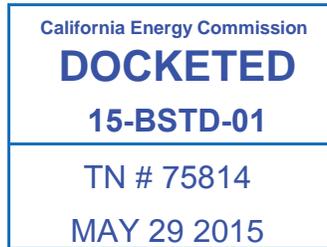


May 29, 2015



Commissioner Andrew McAllister  
California Energy Commission  
Attention: Docket No. 15-BSTD-01  
Dockets Office 1516 Ninth Street, MS-4  
Sacramento CA 95818

***Re: Consideration of a Photovoltaic Compliance Credit for the 2016 Building Energy Efficiency Standards***

Dear Commissioner McAllister:

We understand that the California Energy Commission (CEC) is actively considering an energy code compliance credit that would allow builders to trade off building energy efficiency requirements for the installation of photovoltaic cells. It appears that the CEC staff is not evaluating this proposed trade-off within the context of the 2016 Building energy Efficiency Standards rulemaking, but instead is intending to add it to the Residential Alternative Calculation Method (ACM) Reference Manual.

PIMA believes that the proposed PV compliance credit could have a significant negative impact on consumers and the long-term energy performance of residential buildings. A proposal with these possible negative effects should have been considered under the regular rulemaking and included in the 45-day language. Moving forward in this fashion would have allowed the CEC and the public to fully evaluate and understand the consequences of trading away proven long-term energy-efficiency measures for PV equipment that may be in place for only a short period or who's long-term performance is not guaranteed. Promoting the use of on-site renewables is certainly important, but it should not come at the expense of leaving future homeowners with higher energy costs.

Moving forward, PIMA urges the CEC to have an open discussion of this proposal with a thorough and transparent evaluation of what the possible costs and benefits will be for the consumer over the life of the building.

Sincerely,

Jared O. Blum  
President