

## ATTACHMENT

### SDG&E Comments and Questions on the New Solar Homes Partnership Draft Guidebook (September 2006, CEC-300-2006-17)

#### ***General Comment***

In reviewing the draft Guidebook (“Guidebook”) the funds for the program are interchangeably referred to as rebates and incentives. To provide clarity to the building industry SDG&E recommends that the funding available for this program be consistently referenced to as an incentive.

#### ***Page 2, Paragraph 3***

The Guidebook references the provision of non-financial support services, offering marketing and technical assistance to builders, as well as training to building officials and salespeople. SDG&E has assumed that the reference to non-financial support services refers to the marketing and technical assistance to builders, etc. which are services that are already offered through existing utility new construction programs and could be modified to incorporate solar related activities/information as well. Does the CEC envision different non-financial support services being provided? To avoid duplication, SDG&E suggests that this support could be provided through existing utility administered programs.

#### ***Page 4, II. Program Eligibility Requirements***

Program participation is defined as homes, condominiums or other multifamily housing. Is the program open to both low-rise and high-rise residential construction? If it is open to high-rise construction, SDG&E assumes that there is no height limitation (number of habitable stories) for participation?

#### ***Page 4, B. Residential Building Energy Efficiency***

SDG&E recommends that the ENERGY STAR<sup>®</sup> appliances being required by the program be described in greater detail. A distinction should be drawn between an installed appliance, such as a dishwasher, versus a supplied appliance, such as a refrigerator.

#### ***Page 11, C. Other Incentives May Affect the Rebate Amount***

SDG&E requests that the CEC clarify if the five (5) percent subtracted from the rebate amount pertains to utility energy efficiency programs. Currently the programs support increased energy efficiency through an incentive to the builder whose developments exceed compliance with the Building Energy Efficiency Standards by 15%. This incentive does not directly support lowering the cost of the photovoltaic system as detailed in the Guidebook.

#### ***Page 12, IV. Reservation Process, Paragraph 3***

*“Only one reservation and one rebate payment will be allowed for each site during the reservation period.”* SDG&E seeks clarification whether this means that a builder would need to submit a reservation form for the entire development if they wish that project to be included in the reservation period? Is the incentive paid only at the completion of the development?

#### ***Page 15, 4. Energy Efficiency Documentation***

For clarification purposes, what format is envisioned for the lighting documentation referenced in this section of the Guidebook? Would details on the plans suffice or is a light schedule required? Is this a verification element for the HERS rater?

Is a CF-1R required for each plan type, elevation, option that may occur in the development? Since variations in windows, options, etc. can cause changes in the compliance margin; SDG&E suggests that a CF-1R be required for each plan type, option or other changes that would impact the compliance margin. These plans could be verified by the program management plan review staff if the utilities are administering the program.

***Page 16, 8. Eighteen Month Checkpoint-Required Documentation***

Is the intent that the map showing all the homes where PV systems are to be installed should have the actual construction pad plotted showing orientation on the lot?

***Page 19 3. Energy Efficiency***

The Guidebook states that documentation must be provided for each residential unit demonstrating savings of at least 15%. For most multi-family dwellings, such as apartment buildings, compliance is usually performed on the whole building and not the individual dwelling units. Is the intent of the NSHP program to have a separate compliance analysis performed for each dwelling and the various permutations that could occur by floor or location in the building? SDG&E recommends that compliance not be required on an individual dwelling unit basis for multifamily buildings but rather a whole building analysis be done and the performance level be at 15%/35% for the building. Additionally, does the CEC envision that common areas in affordable housing projects are modeled separately to achieve an improvement of 20% above code in energy efficiency or would these areas be included in the complete building analysis assuming all other Building Energy Efficiency Standards are met?

***Page 22, Energy Efficiency Documentation***

Is the applicant required to supply the CF-4R from the HERS Rater to verify the actual installation of system and testing results? The Guidebook currently only references the CF-6R.

***Page 27, Appendix 2-System Size Justification***

What document does the CEC envision will be required to be submitted for the building's on-site estimated annual electricity consumption? For multi-unit dwellings would this information be required to be provided by dwelling unit or building (see modeling question from page 19)?

SDG&E requests that the CEC clarify what is meant by "licensed energy rater."

***Page 34, C. Field Verification and Diagnostic Testing Process***

Currently the statewide utilities use the HERS Providers databases to document projects and facilitate HERS Rates to record field verification. Does the CEC envision that this would continue as a method to record the NSHP participation? It is important that the HERS providers as well as the HERS raters are aware of program participation and requirements. SDG&E plans to work closely with the HERS Providers to develop training and information for the HERS raters to ensure accurate field verification and recordation.