CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION
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DOCKET
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DATE MAY 29 2007
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May 29, 2007

Jackalyne Pfannenstiel, Chairman
Arthur Rosenfeld, Commissioner
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: **Docket Number: 05-BSTD-2**
2008 CEC Title 24 Building Energy Efficiency Standards Rulemaking Proceeding
Section 114 – Residential Swimming Pool Pumping Equipment

Dear Chairman Pfannenstiel and Commissioner Rosenfeld:

The California Solar Energy Industries Association (CALSEIA) was founded in 1977. CALSEIA represents solar electric and solar thermal manufacturers, distributors, contractors, designers, consultants, engineers and associated businesses who do business in California. CALSEIA supports the widespread adoption of solar thermal and solar electric systems. There are currently over 150 CALSEIA Member companies.

CAL SEIA wishes to alert the Commission to two areas of concern to our member companies and their solar customers. While these topics have been raised during the recent proceedings, we believe that written documentation of our concern is appropriate.

1. Solar swimming pool heating systems require certain flow rates of pool water in order to function properly. Any Title 24 regulations should allow for solar systems to operate at up to maximum pump flow during all periods of the day when solar resource is available.

2. Solar swimming pool heating systems must operate during sunlight hours in order to collect solar energy. Electrical customers who operate swimming pool pumping equipment during daylight hours in order to operate a solar swimming pool heating system should not be required to take electricity for this purpose on a Time of Use rate.

Please consider these points as the new regulations are being formulated. CAL SEIA's interest is in ensuring that Californians can utilize solar swimming pool heating systems to reduce their consumption of natural gas, and are not penalized for doing so through inadvertent or unintended consequences of regulation or law. Solar systems which preserve natural gas

supplies for higher value purposes such as electricity generation, and which reduce emissions of nitrous oxides and carbon dioxide should continue to play a prominent role in California's energy infrastructure.

Please contact me if I can provide further information on this topic.

Sincerely,

Sue Kateley
Executive Director