



Regulatory Advisory

March 21, 2023

Solar Access Roof Area (SARA) Determination in the 2022 Energy Code

Starting January 1, 2023, the 2022 Building Energy Efficiency Standards (2022 Energy Code) modified existing solar photovoltaic (PV) requirements to require solar PV to be installed on available roof space for new construction. Instead of solely requiring the installation of a certain amount of solar PV, the 2022 Energy Code now accounts for available roof space, referred to as Solar Access Roof Area (SARA). SARA is specifically used to calculate the area of a building's roof space capable of structurally supporting a PV system.

The modifications to the solar PV requirements also include an option to allow stakeholders to seek a determination from the California Energy Commission's (CEC) executive director if a building's available SARA will be limited by a conflicting building code requirement. Pursuant to California Code of Regulations, Title 24, Part 6, sections 140.10(a), 150.1(c)(14), or 170.2(f), SARA does not include "[r]oof space that is otherwise not available due to compliance with other building code requirements if confirmed by the Executive Director."¹

The CEC has received questions from stakeholders about whether this determination needs to be made for both state and local building codes. This advisory is intended to provide guidance about the differences between statewide codes and local building codes that may limit the available SARA for solar PV, and to explain when seeking a SARA determination is necessary.

1. Stakeholders do not need a SARA determination for statewide building codes as they are already factored into the 2022 Energy Code.

Statewide building code requirements do not require a formal determination by the executive director because the 2022 Energy Code already accounts for statewide requirements when determining the SARA. Per the 2022 Energy Code, SARA is limited to "available" roof space that is "capable of structurally supporting a PV system," and any "obstructions that are part of the building design and elevation features" shall be considered when calculating annual solar access availability on a specific roof.² Statewide requirements do not require a separate determination because they are

¹ Title 24, Part 6, sections 140.10(a)(2)(C), 150.1(c)(14)(B)(iii), 170.2(f)(B)(iii).

² Title 24, Part 6, sections 140.10(a), 150.1(c)(14), 170.2(f).

already factored into the building's design when ensuring compliance with the California Building Standards Code. Therefore, roof space is not "available" if it is required to be used by other provisions of the California Building Standards Code.

2. Stakeholders that wish to have their available SARA space reduced by local building code requirements shall first seek an executive director determination that SARA is not available due to compliance with the local building code.

Pursuant to sections 140.10(a), 150.1(c)(14), or 170.2(f), for local building codes that require SARA space to be used for other purposes, any stakeholder may submit a request to receive a determination from the CEC executive director that SARA is not available due to compliance with the local building code.

If a stakeholder believes that they have a local building code requirement that will limit the available SARA space, the stakeholder should reach out to the CEC and request a determination from the executive director at:

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CEC Building Standards Branch

To facilitate the review of requests for a determination, the CEC recommends stakeholder requests include a citation to the city or local building code requirement showing that a certain amount of roof space must be used in a way that is incompatible with the 2022 Energy Code PV requirement.