

DOCKETED

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CALSSA comments on Benjamin Project

Additional submitted attachment is included below.



July 18, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 22-BSTD-04
715 P Street
Sacramento, CA 95814-5504

RE: Comments to Docket No. 22-BSTD-04 on Application for Photovoltaic System Requirement Determination for the Benjamin Project in Accordance with Section 10-109(k) of the Building Standards

Dear California Energy Commissioners and staff:

Thank you for the opportunity to provide comments on C Note Limited Partnership's request for an exemption from the new home solar mandate for the Benjamin Project. The California Solar and Storage Association has been supportive of requirements and provisions in the building standards that encourage the development of solar. We understand the need for an exemption from the solar requirement in instances in which the project is not cost effective. However, upon review of the exemption application, analysis, and resources compiled by the Energy Commission, the project appears to be cost effective, and therefore, no exemption is warranted.

The Energy Commission's analysis shows a project cost of \$7.66/watt, which is higher than the Energy Commission's cost estimates justifying the solar mandate and could result in the project not being cost effective. However, some of the costs that make up the \$7.66/watt figure appear to be higher than necessary, such as for the racking and mounting hardware. The project as proposed would use Ironridge flat roof attachments. Alternatively, the project could use Ironridge ground mount attachments (on the flat roof), which would reduce the racking and mounting costs – currently totaling \$0.59/watt – by approximately 50 percent. One reason the cost of ground mount attachments is less expensive than flat roof attachments is that the former requires fewer roof penetrations. Additionally, installing panels to ground mount attachments is easier than installing panels to flat roof attachments because the installer has more space to work below the panels. Flat roof attachments require the roofer to install blocks between the trusses, which is a simple and inexpensive addition to the roof supports.

One other component of the \$7.66/watt total cost is labor, which also appears high at \$2.24/watt. One reason for the high proposed labor cost is that C Note Limited Partnership is calculating the cost using prevailing wage. Calculating labor costs using non-prevailing wages could reduce the labor costs by approximately 16 percent. The quote the Commission received from Cal Solar Inc. that uses non-prevailing wages reduces the cost to \$4.33/watt after the investment tax credit. (Note: Cal Solar Inc.'s estimate is for the more expensive flat roof attachments because they assumed the roof was already constructed. Their estimate does not include operations and maintenance costs.) Solar energy projects in Lodi Electric Utility are exempt from the prevailing wage requirements in Assembly Bill 2143.



We understand that some of the costs of multifamily solar projects in Lodi Electric Utility are higher than elsewhere because of characteristics specific to Lodi Electric Utility. For example, Lodi requires performance meters, charges a high interconnection fee, and does not allow virtual net energy metering. However, the project can still be cost effective if the developer makes changes to the project plans, materials, and labor.

We thank the Energy Commission staff for assembling a number of resources to help the public assess and make public comment on the cost effectiveness of the Benjamin project. We look forward to continuing to work with Commission staff.

Sincerely,

A handwritten signature in black ink that reads "Benjamin Davis".

Benjamin Davis
Policy Associate
California Solar & Storage Association