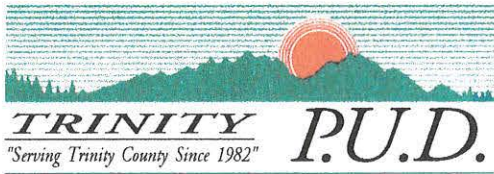


<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-05
<b>Project Title:</b>	Photovoltaic System Requirement Determination for Trinity Public Utility District
<b>TN #:</b>	228621
<b>Document Title:</b>	Trinity Public Utilities District's Photovoltaic Determination Cover Letter
<b>Description:</b>	N/A
<b>Filer:</b>	Cheng Moua
<b>Organization:</b>	Trinity Public Utilities District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	6/5/2019 12:01:28 PM
<b>Docketed Date:</b>	6/5/2019



March 15, 2019

Maziar Shirakh, P.E.  
Senior Engineer, Building Energy Efficiency Standards  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[Maziar.Shirakh@energy.ca.gov](mailto:Maziar.Shirakh@energy.ca.gov)

Re: Trinity Public Utility District's Request for a Residential Photovoltaic Determination

Dear Mr. Shirakh,

On behalf of the Trinity Public Utility District (TPUD), I am writing to seek a determination from the California Energy Commission (CEC) under Section 10-109(k) of the 2019 Energy Code. Section 10-109(k) allows the Commission to determine that the photovoltaic requirements of Section 150.1(c)14 should not apply, if the Commission finds that the Commission's cost-effectiveness conclusions are not accurate. TPUD seeks a determination that Section 150.1(c)14 is not cost-effective and should not apply for all residential housing in the TPUD service area.

While the CEC's ambitious goal to wean California from fossil-fuel based energy generation is admirable, this requirement is not cost-effective in the TPUD service area. The TPUD service territory is unique and energy policy in California reflects its unique situation. Specifically, TPUD distributes and sells 100% carbon-free hydropower that is fully compliant with California's Renewables Portfolio Standard. We also serve the poorest county in the state of California, and our remote location makes building in Trinity County more expensive than elsewhere, exacerbating our desperate housing shortage.

TPUD's low rates simply make rooftop solar uneconomic in TPUD's service area. The CEC, in adopting the rooftop solar mandate appears to have relied, in part, on cost-effectiveness conclusions developed by its consultant, E3. Upon review of the E3 report, TPUD believes that some of the assumptions within this report are not correct as applied to TPUD. Trinity PUD's residential rate schedule is attached showing our residential energy charge, which ranges from \$.05545 per kWh to \$.07822 per kWh depending on the geographic area of our system. By 2023, even this higher rate will be reduced, making rates within all of TPUD's service area roughly \$.055 per kWh. With this clarification, we believe the CEC would have reached different conclusions about the cost-effectiveness of the Section 150.1(c)14 mandate within TPUD's service area.

Maziar Shirakhk, P.E.

March 15, 2019

Page 2

On behalf of Trinity Public Utilities District, I respectfully request that the California Energy Commission make the determination under Section 10-109(k) of the 2019 Energy Code that the photovoltaic requirements of Section 150.1(c)14 do not apply within Trinity Public Utilities District's service area.

Sincerely,



Paul Hauser  
General Manager

Enclosure

cc (email only):

Rebecca Westmore  
Mike McGuire  
Jim Woods  
Drew Bohan