

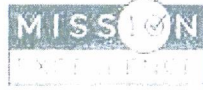
DOCKETED

Docket Number:	19-BSTD-08
Project Title:	Community Shared System Applications
TN #:	229873
Document Title:	KHovnanian Homes Comments - On Community Shared Electric Generation System Application by SMUD
Description:	N/A
Filer:	System
Organization:	KHovnanian Homes
Submitter Role:	Public
Submission Date:	9/27/2019 2:53:06 PM
Docketed Date:	9/27/2019

Comment Received From: KHovnanian Homes
Submitted On: 9/27/2019
Docket Number: 19-BSTD-08

On Community Shared Electric Generation System Application by SMUD

Additional submitted attachment is included below.



Northern California Division
3721 Douglas Boulevard, Suite 150
Roseville, CA 95661

September 23, 2019

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Community Shared Electric Generation System Application by the Sacramento Municipal Utility District

Dear Sirs:

KHovnanian Homes expresses our strong support for the Community Shared Solar Electric Generation System Application by the Sacramento Municipal Utility District (SMUD). SMUD is applying to administer a community solar program option meeting the requirements under Section 10-115 of the 2019 Building Standards.

Section 10-115 allows a community solar program that meets Community Shared Solar Electric Generation System requirements to be used by a builder/developer as a compliance alternative to the onsite photovoltaics required by Section 150.1(b)1. We believe that SMUD's Application is a valuable option for compliance with the 2019 Building Standards solar requirements in the SMUD service area, while still providing the benefits of solar power associated with new homes built in California.

The January 1, 2020 effective date of the 2019 Building Standards is fast approaching. The community solar option that was included in the 2019 Building Standards as they were developed and adopted in mid-2018 needs to be available for builders to consider for Standards compliance. Community solar systems allow for cost-effective solar developments that can be located and oriented to better meet community or system grid needs and provide additional flexibility in new housing developments while achieving compliance with the Standards.

We strongly encourage timely adoption by the Commission of SMUD's Community Shared Solar Electric Generation System Application.

Sincerely,

Olga Sciorelli, P.E., QSD, QSP
Land Planning Manager