

**DOCKETED**

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<b>Document Title:</b>	Lendlease Energy Development LLC Comments - Support for SMUD
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*Comment Received From: Lendlease Energy Development LLC*  
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*Docket Number: 19-BSTD-08*

**Support for SMUD**

*Additional submitted attachment is included below.*



October 9, 2019

California Energy Commission  
Docket 2019-BSTD-08  
1516 9th Street  
Sacramento, CA 95814

RE: Large Scale Community Solar Application by the Sacramento Municipal Utility District

Lendlease Energy Development LLC (Lendlease) 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 or rooftop photovoltaics required by Section 150.1(b)1. California continues to need diverse options to help meet carbon reduction goals. Large scale solar can provide a stable cost-effective solar development that can be located and oriented to better meet community or system grid needs while also providing good jobs and the benefits of solar.

The community solar option needs to be available for builders to consider before the January 1, 2020 effective date of the 2019 Building Standards. This is particularly true for the low-rise multi-family developments affected by the Standards, where space for on-site solar may be scarce.

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

Yours sincerely,

A handwritten signature in black ink that reads "Craig R. Carson". The signature is written in a cursive, flowing style.

**Craig Carson**  
**Senior Vice President**  
**Lendlease Energy Development LLC**

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