

DOCKETED

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Comment Received From: Spectrum Energy Development Inc
Submitted On: 10/8/2019
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SMUD Application to Administer a Community Shared Solar System

Additional submitted attachment is included below.

From: mailagent@thesoftedge.com on behalf of deosborn.solar@gmail.com
To: [Energy - Docket Optical System](#)
Subject: 19-BSTD-08 SMUD APPLICATION TO ADMINISTER A COMMUNITY SHARED SOLAR SYSTEM
Date: Tuesday, October 8, 2019 1:15:33 PM

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Dear Commissioners:

My name is Donald Osborn and I work in the solar industry for Spectrum Energy Development Inc in Wilton, CA. I BOTH live and have my business headquartered in the SMUD service area. I am submitting these comments in opposition to SMUD's Community Shared Solar Electric Generation System ("SolarShares") application for the following reasons:

- 1) The SolarShares program does not encourage new solar in Sacramento neighborhoods. Rather, the solar shares will come from SMUD's generation capacity on existing and future solar farms, some of which are miles from Sacramento such as a project near Fresno. This is NOT what Community Solar is supposed to be.
- 2) The SolarShares program offers customers poor financial benefits compared to the benefits they would receive with a NEM-eligible system. The typical customer enrolled in SolarShares is only guaranteed to benefit \$10-\$20 annually, depending on system size. This is even more true for multifamily housing.
- 3) The SolarShares program prevents homeowners from building solar into their mortgage, which is the cheapest way to finance rooftop solar.

The SolarShares proposal is a threat to the solar mandate not only in Sacramento, but across the state. If the Commission approves the program, we can expect other utilities to submit similar proposals, threatening the underlying vision and promise of the new home solar mandate. For these reasons, I am urging that the Commission disapprove SMUD's application.

I can be reached at deosborn.solar@gmail.com. Thank you for the opportunity submit comments.

Sincerely,

Donald Osborn