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*Comment Received From: Sustainable Energy Group
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 raydarby@sustainableenergygroup.com
To: [Energy - Docket Optical System](#)
Subject: 19-BSTD-08 SMUD APPLICATION TO ADMINISTER A COMMUNITY SHARED SOLAR SYSTEM
Date: Tuesday, October 8, 2019 4:27:36 PM

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Dear Commissioners:

My name is Ray Darby and I work in the solar industry for Sustainable Energy Group in Nevada City, CA. 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.
- 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.
- 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 raydarby@sustainableenergygroup.com. Thank you for the opportunity submit comments.

Sincerely,

Ray Darby