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Sunrun Comments - Oppose SMUD Community Share Solar Proposal

Additional submitted attachment is included below.



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October 9, 2019

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 19-BSTD-08
1516 Ninth Street
Sacramento, CA 95814

Re: 19-BSTD-08 SMUD Application to Administer a Community Shared Solar System

Sunrun Inc. (Sunrun) is submitting comments in opposition to the Sacramento Municipal Utility District's (SMUD) Application to Administer a Community Shared Solar System (SolarShares proposal).

About Sunrun

Sunrun (Nasdaq:RUN) is the nation's leading residential solar, storage and energy services company. With a mission to create a planet run by the sun, Sunrun has led the industry since 2007 with its solar-as-a-service model, which provides clean energy to households with little to no upfront cost and at a saving compared to traditional electricity. The company designs, installs, finances, insures, monitors and maintains the systems, while families receive predictable pricing for 20 years or more. The company also offers a home solar battery service, Sunrun Brightbox, that manages household solar energy, storage and utility power with smart inverter technology. For more information, please visit: www.sunrun.com.

Discussion

The Energy Commission should oppose SMUD's SolarShares proposal because it undermines the Commission's 2019 Title 24 standards. This critical policy demonstrates the state's confidence in solar to deliver clean, affordable and reliable energy to Californians. The Energy Commission had the foresight in moving to incorporate in Title 24 new technologies, such as home solar and batteries, which offer people cleaner energy and reduces their reliance on centralized power plants and costly infrastructure. Our future energy mix will include the energy generated from home solar and batteries which will strengthen communities' resilience while reducing their load, thereby relieving pressure on the electricity grid. At the same time, homes

that rely less on energy from distant fossil-fuel power plants will reduce carbon emissions and improve air quality without requiring additional infrastructure to achieve these goals.

The SolarShares proposal undercuts the Title 24 standards because it does not encourage new solar on Sacramento homes. Rather, the solar shares will come from SMUD's solar farms, some of which are many miles from Sacramento, and will do nothing to reduce California homes' energy load (especially during peak load) and reliance on centralized power. The typical customer enrolled in SolarShares is only guaranteed to benefit \$10- 20 annually, depending on system size, which is far less than what renters and homeowners can save with onsite rooftop solar systems.

Sunrun does not oppose shared solar programs. However, SMUD's proposal would be a substantial step backwards for clean energy in California, and risks limiting the number of homes and businesses that would benefit from rooftop solar if implemented in Sacramento or beyond. SMUD's proposal should not be used as a compliance mechanism to meet the Title 24 standards for new solar homes.

Conclusion

For the reasons stated above, Sunrun encourages the Energy Commission to oppose the SMUD SolarShares proposal. Sunrun appreciates the opportunity to provide comments.