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Fees for residential and commercial solar battery storage

The Sacramento Municipal Utility District (SMUD) has submitted a proposal to the California Energy Commission (CEC) that would bypass local compliance with the state's new solar homes mandate and set dangerous precedent statewide. I am asking the CEC Commissioners to reject SMUD's proposal.

When the Energy Commission created the solar mandate, it included a provision to allow builders to meet the solar requirements by enrolling new homes in community solar programs. Now, SMUD has submitted a proposal to the Commission to allow their revamped green tariff program (called "SolarShares") to meet the requirements of on-site solar instead. Here are a few critiques of this approach:

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. SMUD does not have rates and installation requirements needed for on-site solar and solar+storage for multifamily housing, such as Virtual Net Metering, that would permit the cost effective installation of on-site solar thus making SolarShares the de facto compliance measure.
4. The SolarShares program prevents homeowners from building solar and solar+storage into their mortgages, which is the cheapest way to finance rooftop solar and storage systems.

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 should expect other utilities to submit similar proposals, threatening the underlying vision and promise of the new home solar mandate. I respectfully request the Commission to reject this proposal.