

DOCKETED

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Support for Approval of SMUD's Neighborhood SolarShares Program

Additional submitted attachment is included below.



INVESTING IN COMMUNITIES

November 7, 2019

A Joint Powers Agency

MEMBERS

City of Sacramento

County of Sacramento

Housing Authority of the
City of Sacramento

Housing Authority of the
County of Sacramento

California Energy Commission Docket 19-BSTD-08
1516 Ninth Street
Sacramento, CA 95814

RE: Support for Approval of SMUD's Neighborhood SolarShares Program

Dear Commissioners,

The Sacramento Housing and Redevelopment Agency (SHRA) was created to ensure the ongoing development of affordable housing and to continuously fuel community redevelopment projects in the city and county of Sacramento. We meet these goals by creating safer neighborhoods and a more robust economy, so individuals, families and children in our community have the opportunity for a better life. Our work has been recognized among the best in the country by the U.S. Department of Housing and Urban Development and others. Every day, our team of over 200 employees secures funding, battles for support, organizes our partners and engages the Sacramento community in a proactive collaboration to change lives. It is critical that all options are available to facilitate construction of new affordable housing units. Dwelling units are needed now. For these reasons, SHRA strongly supports certification of SMUD's Neighborhood Solar Shares Program. because it supports our mission to ensure ongoing development of affordable housing.

The CEC's adoption of a solar mandate for new low-rise residential dwellings represents a significant change to our state building code. Recognizing that the State of California is still in the grips of an enduring housing crisis and that, in a state the size of California, one size does not fit all, the CEC worked with stakeholders to provide several compliance options. In general terms, the CEC has allowed for three compliance paths in meeting California's renewable energy mandate for new homes and low-rise apartments. The Community Solar option is particularly effective in facilitating the construction of affordable housing units.

The Community Solar option allows the builder to comply with some or all the renewable energy mandate using solar energy produced at an off-site facility. This option will be especially useful in new:

- low-rise multifamily (where there is more than one unit located under the same area of roof),
- infill projects, and
- high-density single-family home projects.

For the Community Solar examples cited above, it may be impossible to find enough area on-site to install an adequate supply of solar panels. Besides, even if there were, it would probably serve our state's housing needs better to use such open areas for additional dwelling unit production and to bring in renewable energy from some remote, off-site source where the land is available and probably at a much lower cost. And down the road, when the CEC adopts a renewable component requirement for new high-rise residential and commercial buildings, the community solar option may well be the most practical and low cost approach to compliance

Once again, SHRA fully supports the CEC's approval of SMUD's Neighborhood Solar Shares Program.

Sincerely,



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