

DOCKETED

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STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:

Sacramento Municipal Utilities District Community
Solar Application

Docket No. 19-BSTD-08

**COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON SACRAMENTO MUNICIPAL UTILITY DISTRICT SOLAR SHARED PROGRAM
APPLICATION**

The California Municipal Utilities Association (CMUA) appreciates the opportunity to provide comments to the California Energy Resources Conservation and Development Commission (Energy Commission) on Sacramento Municipal Utility District's (SMUD) Community Solar Application.

CMUA is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA membership includes publicly owned electric utilities (POUs) that operate electricity generation and distribution and transmission systems. In total, CMUA members provide approximately 25 percent of the electric load in California. California's POUs are committed to, and have a strong track record of, providing safe, reliable, affordable and sustainable electric service.

I. INTRODUCTION

California 2019 Building Standards establish the requirements that must be met for a Community Shared Solar project to be eligible as a solar compliance option for newly constructed buildings.¹ In early September 2019, SMUD submitted an application to be the

¹ 24 Cal. Code Regs. (CCR) § 10-115 and CCR § 150.1(b)(1).

administrator for a Community Solar Program which is designed to meet those requirements and provide participating builders and homeowners with an attractive, low-cost, and effective option to consider in addition to the option of onsite solar photovoltaic (PV) generation.

II. COMMENTS

A. Community Owned Solar Programs Present a Beneficial Compliance Option

Community owned solar programs provide an important mechanism that will increase the options by which California can achieve its renewable energy goals. Community owned solar programs provide a reduced cost way of increasing solar generation and maintain choices for consumers who may not be best served by rooftop PV. Additionally, a Community owned solar program can be a very desirable option when there is insufficient space to install an appropriate number of solar panels, such as high-density single-family homes and multifamily projects. Community Solar programs can also allow increased tree density in new neighborhoods, improving air quality and home cooling and facilitating “tree canopy” benefits without reducing solar benefits.

B. The SMUD Community Solar Application Has Been Fully Vetted by Energy Commission Staff and is Recommended for Approval

On September 24, 2019, Energy Commission staff submitted its review of SMUD’s community solar application.² Energy Commission staff evaluated SMUD’s application for enforceability, energy performance, dedicated building energy savings, durability, additionality of renewable benefits and accountability. As a result of this detailed evaluation, Energy Commission staff has determined that the SMUD Community Solar Application satisfies all requirements for eligibility as a compliance option under the regulations and recommends that the application be approved.

² Energy Commission Docket 19-BSTD-08.

III. CONCLUSION

CMUA supports the Community Solar Program and encourages the Energy Commission to approve SMUD's Community Solar Application.

Dated: November 8, 2019

Respectfully submitted,



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