

DOCKETED

Docket Number:	19-BSTD-08
Project Title:	Community Shared System Applications
TN #:	230604
Document Title:	CA Chapters of the National Electrical Contractors Association Comments - Community Shared Solar Electric Generation System Application by the Sacramento Municipal Utility District
Description:	N/A
Filer:	System
Organization:	CA Chapters of the National Electrical Contractors Association
Submitter Role:	Public
Submission Date:	11/12/2019 2:20:27 PM
Docketed Date:	11/12/2019

*Comment Received From: CA Chapters of the National Electrical Contractors Association
Submitted On: 11/12/2019
Docket Number: 19-BSTD-08*

Community Shared Solar Electric Generation System Application by the Sacramento Municipal Utility District

Additional submitted attachment is included below.

POLITICO GROUP

November 12, 2019

California Energy Commission
1516 9th Street
Sacramento, CA 95814
Docket 2019-BSTD-08

RE: Community Shared Solar Electric Generation System Application by the Sacramento Municipal Utility District

I am writing on behalf of the California Chapters of the National Electrical Contractors Association (NECA) in support for the Community Shared Solar Electric Generation System Application submitted by the Sacramento Municipal Utility District ("SMUD"). NECA represents over 1200 electrical contractors throughout the State of California who perform a wide variety of electrical work from residential and commercial to small and large-scale energy generation, distribution and storage projects. NECA members include both C-10 and C-46 contractors and install both rooftop and utility scale solar energy systems. NECA has long been a leading supporter of legislative efforts to increase both solar and energy storage capabilities in California in order to address climate change.

SMUD is applying to administer a community solar program option meeting the requirements under Section 10-115 of the 2019 Building Standards. Section 10-115 allows a community solar program that meets Community Shared Solar Electric Generation System requirements to be used by a builder/developer as a compliance alternative to the onsite or rooftop photovoltaics required by Section 150.1(b)1. NECA supports allowing community solar programs to include participation in utility scale solar projects that are more cost-efficient and can provide greater benefits to homeowners. Utility scale solar provides benefits beyond that of rooftop solar including eliminating the risk of lost generation from rooftop maintenance and performance issues, allowing for "tree-friendly" developments, and costing less per kW. SMUD's proposal adds the additional benefits of guaranteed level solar generation for twenty years, and a solar allocation during rainy or cloudy periods.

Our members have experience working with community solar projects like the SMUD Rancho Seco II project and with installing rooftop solar directly on buildings. NECA believes there is a place for both types of projects to meet the Commission's greenhouse gas reduction goals. Both types of projects will achieve these goals. Builders should have the choice of selecting the most cost-effective method to meet the solar energy mandates of Section 150.1(b). SMUD's proposal leverages key benefits that lead to community solar success by reducing costs and providing customers with these benefits over a long-term period. SMUD's proposal provides occupants with long-term certainty that they will receive a net benefit under the program.

California continues to need diverse options to help meet carbon reduction goals. Community solar can provide a stable cost-effective solar development that can be located and oriented to better meet community or system grid needs while also providing good jobs and the benefits of solar.

Ultimately, the goal of Section 150.1(b) is to reduce energy demand and reduce greenhouse gas emissions, not to just replace more economic utility scale solar energy systems with rooftop systems. NECA's contractors have, and will continue to, install both types of systems. Innovative programs to more efficiently meet new construction energy requirements should be encouraged, particularly for low-rise multi-family developments affected by the Standards, where space for on-site solar may be scarce.

NECA respectfully urges timely adoption by the Commission of SMUD's Community Shared Solar Electric Generation System Application.

Sincerely,
Kindest regards,



Eddie Bernacchi
Legislative & Regulatory Advocate