

DOCKETED

Docket Number:	19-BSTD-08
Project Title:	Community Shared System Applications
TN #:	230617
Document Title:	PG&E Comments - PGE Supports SMUD SolarShares Application
Description:	N/A
Filer:	System
Organization:	PG&E
Submitter Role:	Public
Submission Date:	11/12/2019 4:40:58 PM
Docketed Date:	11/12/2019

Comment Received From: PG&E
Submitted On: 11/12/2019
Docket Number: 19-BSTD-08

PGE Supports SMUD SolarShares Application

Additional submitted attachment is included below.

November 8, 2019

POSTED ELECTRONICALLY TO DOCKET 19-BSTD-08

California Energy Commission
Dockets Office, MS-4
Docket No. 19-BSTD-08
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Sacramento Municipal Utility District (SMUD) Application to Administer A Community Shared Solar System

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments to the California Energy Commission (CEC) on the Sacramento Municipal Utility District's (SMUD) request for approval of its proposed Neighborhood SolarShares Program. PG&E's commitment to providing safe, reliable, clean affordable energy also includes providing customers with alternatives to access renewable energy.

PG&E applauds SMUD for offering a solution to serve projects permitted at the start of the new Title 24 Cycle, and supports its application based on the following:

- The program would be Green-e Energy certified or equivalent; SMUD's requirement to track and retire bundled Renewable Energy Credits (RECs) will ensure there is no double counting of RECs for purposes of RPS compliance.
- CEC staff has reviewed SMUD's application for technical conformance and recommended it for approval.
- A community solar option overcomes some of the inherent inequities from mandatory rooftop solar. Not every house is well-suited for rooftop solar due to shading, roof design, and rooftop orientation. If ZNE building standards are expanded to commercial and multi-story buildings, the imbalance between available roof space and occupant load is further exacerbated. Community solar overcomes these limitations.
- PG&E supports expanding options available for cost-effective compliance with the Title 24 solar requirements. Community solar offers an affordable compliance option on a per-watt cost basis. By selecting optimal locations and solar panel orientations, economies of scale can be achieved, and cost-savings can be passed on to consumers in the form of reduced home prices.
- There is high demand from the builders and contractors for a community solar option to comply with Title 24.

In conclusion, PG&E is a strong supporter of the community solar approach. Our existing Regional Renewable Choice program allows participating customers to meet up to 100 percent of their energy usage with generation from eligible renewable sources. PG&E supports community shared resources to meet Title 24 standards and looks forward to continued engagement with the CEC and other stakeholders.

Sincerely,

Jessica M Melton