

DOCKETED

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Implement & Expand Rooftop Photovoltaic requirement 1-1-2019; no SMUD exceptions!

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11/12/2019

To the California Energy Commission, and the Governor-

This is a Request to Remove Item 6. From Consent Calendar: "Sacramento Municipal Utility District (SMUD) Community Solar Program" from November 13, 2019's Business Meeting Agenda for full consideration (in favor of more responsible strategic rulemaking)

The headline "State's Solar Mandate May Get Escape Hatch", leads the front page article of Business section in today's LA Times. That's INFURIATING! But the article's details are worse: the CEC is poised to allow via Consent Calendar, and its staff recommended "offsite solar" as a runaround of a law mandating rooftop solar to be implemented at the beginning of 2020!

MONSTROUS! In case you missed it, Climate Catastrophe is ON. Right NOW. Right THIS SECOND! The rest of the newspaper has plenty of stories about it (just look for all the fire pictures. Or of animals going extinct)

1. THE ERA OF CALIFORNIA'S OVERHEAD ELECTRICAL LINES IS OVER. No utility on earth may be able to keep them up; with their cost of remediation- zero resistance to wildfires, or increasingly-common high winds, negligible resistance to storm damage, snow/ ice... Overhead power lines are magnets for lightning strikes... millions of wooden poles (which sometimes fall to car crashes) needing to be converted to non-flammable ones ASAP... the cost for maintaining tens of thousands of miles of lines needing ongoing inspections & tree-trimming like never before- especially in steep, remote areas, throughout California is staggering. And downed power lines sometimes electrocute people, even if they don't start fires. Overhead power lines must be

destroyed before they destroy us!

2. By preemptively cutting off power for millions of customers anytime fire risk is suspected, on top of propping up the overhead power network, CALIFORNIA'S ELECTRICAL UTILITIES ARE NOW UNDENIABLY ENGAGED IN CORPORATE SUICIDE.

IF ONLY THERE WAS A SOLUTION... But there is!

1. INSIST ON UNIVERSAL ROOFTOP SOLAR, & KILL THE WORK-AROUND! Except for remote locations, most rooftop solar systems employ "a utility grid inter-tie" as a substitute for an on-site storage battery, which can "spin the meter backwards" (selling the utility up to 10% of surplus power generated). Then, if utility power fails, the customer can throw a switch completely disconnecting the utility grid (and protecting any worker attempting to restore broken a power line from electrocution) and choose to use their own on-site rooftop power. This is why a remote solar farm dependant on a utility power & its power line is so strategically foolish, defeating the main advantage of no-excuses rooftop solar!

2. If the owner of on-site solar panels has an on-site battery bank, and use their power judiciously, a fossil-fuel-free lifestyle without a utility is possible. Think how this would improve service by limiting outages to only the places where the disaster is, not endangering or punishing the entire surrounding utility district where it isnâ€™t.

3. California should NOT buy up the utilities who got us in this mess; DISASTROUS! Do not buy the utilities, but DO REQUIRE THEY HELP US BURY THE PROBLEM: all power lines in California must go underground! Is there a risk from earthquake breaks/ backhoe breaches? Certainly, but clearly not as bad or expensive or deadly as what's going on with lines overhead now! The State can help utilities do that, (which has the side benefit of not disrupting existing employment, yet increasing employment statewide).

Starting with any new construction... (Hello? We need "Urban Growth Boundaries" to corral the problem within manageable "City Limits" DECADES AGO! Have you two (who have the power to do something about it!) noticed: California is FULL, yet developers & speculators keep sprawling- leapfrogging- spewing fire-prone wooden housing & not-so-mobile-home parks into exurban fire-prone wildlands, far beyond the strategic capacity of fire departments', utilities', & transit networks' abilities to reach them!) WILL YOU TWO WORK TOGETHER TO PUT A STOP TO THIS?

Using figures in the article, there is another huge rooftop solar side-benefit to Californians: saving money. The no-excuses rooftop mandate will save the "average single-family home" an estimated \$35/ month (x 12 months) = \$420/ year), while the utility-based solar farm workaround saves a pathetic \$20/ year. For those who don't want rooftop solar costs added to their mortgage, there are private companies that will lease a homeowner a solar system for their rooftop, sell the power back, maintain the rooftop equipment, and pass on the savings to the homeowner (I have friends in Long Beach who've raved about their advantages of doing this for years).

Though better than fossil-fuelled- & "peaker plants", there are disadvantages to utility-based

power companies:

A. Providing electricity is NOT their primary business; No, that is that they must show profits! must pay dividends to their investors. And pay overhead costs to their President, CEO, Boardmembers.

B. Transmission Line-Loss, can = 8-10% crossing the Mojave desert. How STUPID is that? I like the desert; and I'd like utility companies to leave it... deserted.

C. Building a solar farm takes up a lot of land; in the case of the photo with the LA Times article, prime farmland. Who pays for that? Isn't that a terrible trend? Who's gonna feed us if California Ag can't? Are utility Directors pulling the mortgage for that land out of their own pockets? (No, out of our pockets!)

ON THE OTHER HAND, WHY NOT CONVERT ROOFTOPS; RETROFITTING EXISTING CITIES- CLOSEST TO WHERE MUCH OF THAT POWER WILL BE NEEDED? (rooftop solar will reflect/ offset some of the "heat island effect" cities produce due to their widespread hardscape)

First: Expand the rooftop solar requirement to ALL new building types & ownership types by 1/1/2020, we'll be implementing a fossil-fool-free future & spurring sustainable Green New Deal employment right here in California- within 2 months!

Next: as soon as practicable (say by the end of 2020?), require preliminary solar retrofit plans for all buildings in California, (letting only historic buildings off the hook), and you two work together to make State subsidy plans to implement it. This could be phased in, starting with the most-at-risk areas first...

Is this going too fast? Some say not fast enough & we're already doomed. So why not ERR ON THE SIDE OF SURVIVAL & DO THE RIGHT THING RIGHT NOW- A COUPLE YEARS BEFORE THE LAST POSSIBLE SECOND FOR OUR ALREADY CLIMATE-DAMAGED FUTURE; Keep the rooftop solar mandate code clean WITHOUT the work-arounds, extending it to ALL NEW BUILDINGS EFFECTIVE 1/1/2020... Then on to ALL California buildings ASAP. Can I count on you two to LEAD NOW?

(John Ulloth)

Without any "skin in the game" at this time, it's only fair to disclose my thinking was shaped: first by developing sales leads with Great Western Solar, and second by installing rooftop solar thermal in 1979, (when San Diego Gas & Electric (SDG&E) leased "experimental" solar thermal systems to select suckers-er customers for \$300/ month (ha!))... Theirs were similar to solar packages- either for domestic hot water, or spa/pool systems which Great Western Solar sold... most of our customers were driven to consider us by SDG&E's high prices, then persuaded to install our rooftop systems (sales managers said we had ~3,000 in SD County), thanks to an estimated 2-4 year payoff, plus State subsidies (promoted by then-Gov. Jerry Brown).

I should also disclose my views on power utilities were shaped by work on 2 citizens campaigns:

one, to finally kill off Auburn Dam (endless investment sunk into an overstudied, hopelessly-faulty site, which would have destroyed the environment filling up canyons, & then flooding Sacramento itself with no time to evacuate ~1/2 an hour after the inevitable earthquake/Reservoir-Induced Seismicity, and hydropower costing twice the market rate)... and the other campaign to force the Sacramento Municipal Utility District (SMUD) to close its Rancho Seco Nuke utility plant... Sacramento's Yellow Pages used to contain disaster pages on evacuation from it in case of Rancho Seco's meltdown. With one exception (someone who got on the board who helped shut down the nuke facility), SMUD's people were the most irresponsible, unresponsive utility I've ever encountered; public & governmental outrage and coverups of their worst-in-the-nation safety record! finally did in their nukes (& took most of a decade). Could it be SMUD's up to its bad tricks again?