

**DOCKETED**

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**American Institute of Architects California Supports SMUD Solar Shares**

*Additional submitted attachment is included below.*



January 21 2020

California Energy Commission  
Docket 19-BSTD-08  
Submitted Electronically to [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

### **Support for Revised SMUD Solar Share Program**

The American Institute of Architects California represents some 11,000 Architects and allied design professionals in our state. We support policies and programs that help move California toward diverse sources of renewable energy and high performance building design which minimizes energy use while increasing resilience, livability, cost efficiency and code compliance. We believe that having multiple alternative means to meet the renewable energy mandates that will soon apply to all newly constructed homes and low rise apartments is desirable and appropriate. The SMUD Solar Share Program has been thoroughly evaluated for technical conformance by CEC staff and recommended for approval. Due to concerns that were voiced during the initial hearing process, action on this matter was delayed, and we congratulate SMUD on taking this additional time to fine tune the program proposal to both address the technical questions raised while also making the program even more flexible and compelling. We enthusiastically support approval of this program as revised, and agree with staff recommendations. We believe that this program will increase consumer options in a cost effective and well considered manner, without eliminating other choices for those consumers who may find themselves better served by other options such as site installed solar. We believe that SMUD customers will in many cases prefer site installed solar, but for some, SMUD Solar Shares will improve cost/benefit due to particular project situations. This can occur without any compromise to the high level policy objectives that drove the original solar requirements, which we also support enthusiastically.

Our offices are located in a SMUD service area, and we plan to utilize the SMUD Solar Share program on a voluntary basis for our leased offices. Our decision to use Solar Shares was driven by our commitments to environmental stewardship, high performance design, and service to society.

Respectfully submitted

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AIA CA Government Relations Liaison

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2016 AIA California President  
2012-2014 AIA National Director  
2008 President AIA Central Valley  
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