

DOCKETED

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Support for Approval of SMUD's Neighborhood SolarShares Program

Additional submitted attachment is included below.



January 24, 2020

California Energy Commission Docket 19-BSTD-08
1516 Ninth Street
Sacramento, CA 95814

Subject: Support for Approval of SMUD's Neighborhood SolarShares Program

Dear Commissioners,

The Sacramento Tree Foundation would like to, again, express our strong support for Sacramento Municipal Utility District's (SMUD) Neighborhood SolarShares Program. We respectfully request the Commission approve the program at its February Business Meeting.

Recent scientific studies and evidenced-based research has giving elected officials, policy makers and urban planner's insights into the inextricable link a robust urban tree canopy has to the health and well-being of a neighborhood. Studies show having access to green spaces and ample tree canopy increases the rate of physical activity in both adults and children; reducing rates of overweight and obesity. To help protect our lungs, trees scrub the air of pollutants, providing life-giving oxygen and may even reduce the prevalence of asthma in children. Shade trees strategically sited at a home can reduce summer energy usage by 30%. Ample tree canopy coverage lowers summer ambient air temperatures and shades the built environment mitigating the adverse effects of urban heat islands. Natural shade provided by trees reduces our exposure to the sun's harmful ultraviolet radiation, which may help reduce the risk of skin cancer, as shade trees absorb nearly 90% of the sun's ultraviolet radiation. Cars are driven slower and drivers are more aware in neighborhoods where trees are plentiful. Studies have found ample neighborhood tree canopy coverage is associated with stronger neighborhood ties – the very fabric of a healthy neighborhood.

SMUD's Neighborhood SolarShares program will keep the option open for homebuilders and homeowners to choose large shade trees to benefit their home, neighborhood and lives.

California is in the midst of an unprecedented housing crisis that requires swift action. Governor Newsom has called for 3.5 million new housing units to be built by 2025. Reaching that ambitious goal will require that all options for housing construction be available, including a community solar option like SMUD's SolarShares.

The Commission's adoption of a solar mandate for new low-rise residential dwellings represents a significant change to our state building code. Recognizing that in a state the size of California, one size does not fit all, the Commission worked with stakeholders to provide several compliance options. The community solar option included in the Building Standards was a thoughtful and critical addition, particularly in light of the shortage of affordable housing units across the State.

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We write to impress upon you how important the community solar option is to prospective homeowners. The significant additional cost of rooftop systems—which can be \$10,000 to \$15,000—can price many prospective homebuyers out of the market, especially those who have lower incomes and/or live in disadvantaged communities. Unlike rooftop systems, SMUD’s Neighborhood SolarShares does not add any additional costs to purchasers—it offers them a guaranteed benefit every year. In addition, SMUD is responsible for maintenance and upkeep of the system, which alleviates the risk that new homeowners could be faced with steep, unexpected repair costs that they may not be able to afford.

We appreciate that SMUD is committed to being a responsible administrator of a community solar program in the Sacramento area. SMUD has engaged with stakeholders and has been responsive to their requests in preparing their amended application. They have made several improvements to their application, each of which our organization supports:

- All resources used for SolarShares will be located in SMUD’s service territory.
- SMUD will only use local solar resources that are 20 MW or less with backup from other local portfolio resources.
- The net participant benefit will be doubled to \$40 a year for an average home (from \$5 per kW per year to \$10 per kW per year).
- SMUD will only use resources that come on-line after January 1, 2020 with backup from other local portfolio resources.
- SMUD will work with participating developers/builders so that builders can offer a point of purchase choice option for prospective homebuyers.

The Sacramento Tree Foundation strongly supports SMUD’s Neighborhood SolarShares Program. It offers a compliance option that will reduce housing costs while retaining the many benefits and services accrued from a well-canopied neighborhood.

We ask that you approve SMUD’s Neighborhood SolarShares program.

Sincerely,



Ray Tretheway
Executive Director