

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-08
<b>Project Title:</b>	Community Shared System Applications
<b>TN #:</b>	231773
<b>Document Title:</b>	docket number, 19-BSTD-08, and Sacramento Municipal Utility District (SMUD) Application to Administer a Community Shared Solar S
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*Comment Received From: Crisand Giles*  
*Submitted On: 1/28/2020*  
*Docket Number: 19-BSTD-08*

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*Additional submitted attachment is included below.*



**NORTH STATE  
BUILDING INDUSTRY  
ASSOCIATION**

January 28, 2020

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

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

Dear Commissioners,

On behalf of the North state Building Industry, we appreciate the opportunity to support Sacramento Municipal Utility District (SMUD)'s Neighborhood SolarShares program and urge you to approve the application at your February Business Meeting.

California is in the midst of an unprecedented housing crisis that requires swift action. That's why Governor Newsom 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, we appreciate that 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.

The Commission's community solar option allows developers and builders to comply with the renewable energy mandate by using solar energy produced at an off-site facility. This facilitates the efficient and cost-effective construction of housing projects that provide the fastest increase in housing supply, including low-rise multifamily, infill projects, and high-density single-family home projects. For many of these housing types, it may be impossible to find enough square footage onsite to install an adequate supply of solar panels.

SMUD has demonstrated they can responsibly administrate a community solar program in the Sacramento area. They have engaged with stakeholders and have been responsive to public requests in amending their application. SMUD has made several improvements to their application, each of which our organization supports.

Please do not hesitate to contact us if you have any questions, we appreciate your time and attention.

Sincerely,

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Director of Policy and Initiatives  
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