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Oppose Revised SMUDs Solar Share Application

I reviewed SMUDs revised solar share application and while improved, it still falls short in addressing the energy needs of the local community and complying with the intent of the new building code. It states that the developer will now be able to give prospective buyer a choice in whether to enroll in solar shares or not and has raised the typical homeowner savings to \$40 a year. Those are good revisions, but I am still concerned that developers will advocate a cheaper initial alternative to go with solar shares to their clients, which then locks the homeowner out of adding their own solar and solar storage for the next 20 years- even if their rooftop is perfect for a solar system!

I also am concerned we are missing a big opportunity to create solar micro-grids out of these new subdivision and large apartment projects where the new building code would apply. Utilities are going to have to adapt to new paradigm where the grid is decentralized to be more resilient, efficient and secure from cyber attacks. Solar micro-grids addresses these future concerns. Solar shares as currently proposed could impeded the development of solar micro-grids to the detriment of the community.

I worry that if SMUD's solar shares program is approved as currently proposed, it will set the bar low for other utilities to immediately copy. I do not think the intent of the building code was to allow perfectly acceptable rooftops to option out their solar potential so developers could sell new homes cheaper and allow utilities to prevent homeowners from adding solar +storage on their homes. If a new home has a shaded roof or the owner wants shade trees instead of solar such that the rooftop is not a candidate for efficient solar, fine- but the developer should not be able to opt into solar shares for financial reasons.

I could support the proposal if the program was revised to allow a homeowner to opt out in the future so they can put on their own rooftop and storage system without SMUD interference. SMUD needs to utilize their proposed solar shares utility scale solar farms so they can retire their existing fossil fuel power plants. Their solar farms should not be used to prevent even one acceptable rooftop from being utilized for solar power generation. Especially for over 20 years!

Thank you for your consideration in this important matter.