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January 29, 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,

Mutual Housing California is writing to express our support for Sacramento Municipal Utility District (SMUD)'s Neighborhood SolarShares Program as an option to meet the states renewable energy mandate and respectfully requests that the Commission approve the program at its February Business Meeting.

Mutual Housing California is a 501c3 non-profit corporation that develops, operates and advocates for sustainable housing. Since 1988, our organization has developed over 1100 affordable homes throughout the Sacramento region and provides leadership opportunities and training for our resident members. In 2001, Mutual Housing California, with assistance from SMUD, developed the first apartment community in the region with an on-site PV system that directly benefits tenants. In 2015, Mutual Housing developed one of the nation's first Zero Net Energy rental community – Mutual Housing at Spring Lake. We are also in the process of developing additional Zero or Positive Net Energy communities throughout California. In 2017, the United Nations recognized our commitment to sustainable housing and resident leadership development by selecting us for the UN World Habitat Award.

We are in full support of the Commission's adoption of a solar mandate, particularly the inclusion of a community solar option. Developing affordable housing can be challenging and expensive. The solar mandate, while commendable, adds another layer of complexity and cost to the production of affordable housing. On-site solar production for multifamily developments has been feasible through the combination of Virtual Net Metering, paired with solar rebates/incentives specifically made available to affordable multifamily developments that reside within the investor owned utility service area. Unfortunately, since these methods are currently not available within SMUD service area, our ability to meet the new Building Code requirements may not be financially feasible. Therefore, SMUD's off-site alternative provides a viable option to meet our collective sustainability goals of providing clean energy to all segments of the State's population.

As we continue to develop sustainable, affordable housing in the Capital Region, Mutual Housing California would greatly appreciate the option of providing either on-site or off-site solar power through SMUD's Neighborhood Solar Shares program. Mutual Housing California asks that you approve SMUD's Neighborhood SolarShares program at the Commission's February Business Meeting.

Sincerely,

Roberto Jimenez Executive Director





