

DOCKETED

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January 31, 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,

The Turlock Irrigation District (TID) writes to express our strong support for the Sacramento Municipal Utility District's (SMUD's) Neighborhood SolarShares program. We urge the Commission to approve SMUD's application at its February Business Meeting.

Like SMUD, TID is a community-owned public utility. TID was organized as the first Irrigation District in California on June 6, 1887 and is close to beginning its 133th year of operation. TID currently serves a retail electric customer base of just over 100,000 customers and provides irrigation water to over 5,800 growers and nearly 150,000 acres of farmland. TID's mission is to provide stable, reliable, and affordable water and power to its customer owners, be good stewards of our resources, and provide a high level of customer satisfaction.

Like SMUD, TID has a long history of environmental stewardship. TID has acquired the resources to meet the 33% by 2020 Renewable Portfolio Standard (RPS), having built the 136 MW Tuolumne Wind Project in 2009 in advance of the RPS mandate on POU's, as well as recently completing a 20-year power purchase agreement for 54 MW of newly constructed in-state utility scale solar. TID's RPS obligation, due to these early and significant investments, is currently projected to be satisfied through 2024. TID is also making investments to ensure that it does its part to meet the State's longer-term Green House Gas (GHG) targets.

Also like SMUD, we are committed to providing clean, renewable power in a safe, environmentally responsible, and cost-effective manner. As publicly-owned electric utilities, we are each dedicated to achieving our green energy goals while ensuring costs are borne equitably among our ratepayers. We applaud SMUD for designing an innovative program that both provides participants with a lower-cost way of obtaining additional, durable solar power without shifting the financial burden to SMUD's other customers.

Community solar is not only affordable; it also offers significant environmental benefits. Participants in SMUD's program will receive additional, durable, renewable power from off-site solar arrays. Because they are off-site, panels can be optimally placed and positioned, increasing generation and reducing demand during peak hours, when gas-fired plants are typically tapped to meet load. In addition, because community solar resources are monitored and maintained by the utility, energy performance is more likely to remain stable and high-performing over time. Tree canopies, too, which naturally improve shading and reduce energy use, will have better



opportunities to develop over new home communities, further reducing demand during peak hours.

SMUD's program is designed to exceed the requirements of section 10-115(a) and will provide additional, affordable, and durable solar power to new homeowners in SMUD's service territory. We are encouraged to see that CEC Staff has, for the second time, recommended approval of SMUD's application. As other supporters have noted, the community solar option was a thoughtful and critical addition to the 2019 Building Standards, and through this letter, we encourage the Commission to approve SMUD's application on February 20.

Respectfully submitted,

_____/s/_____
Austin S. Avery
Turlock Irrigation District