

DOCKETED

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Comment Received From: Daniel Jacobson
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SMUD

Additional submitted attachment is included below.



February 4, 2020

Dear Arlen Orchard,

On behalf of Environment California, I want to express serious concern with the Sacramento Municipal Utilities District's (SMUD) revised SolarShares proposal. We urge you to direct SMUD to work together with stakeholders to improve the proposal to implement California's landmark Title 24 standard requiring solar for new home construction. We believe that by working together we can successfully maintain California's efforts to dramatically decrease climate pollution.

Solar power is expanding rapidly. The United States now has over 60 gigawatts (GW) of solar photovoltaic (PV) capacity installed — enough to power nearly one in every 11 homes in America. Hundreds of thousands of Americans have invested in solar energy and millions more are ready to join them.

America's major cities have played a key role in the clean energy revolution and stand to reap tremendous benefits from solar energy. As population centers, they are major sources of electricity demand and, with millions of rooftops suitable for solar panels, they have the potential to be major sources of clean energy production as well.

To continue America's progress toward renewable energy, cities, states and the federal government should adopt strong policies to make it easy for homeowners, businesses and utilities to "go solar."

California leaders spearheaded some of the most ambitious climate policies in the nation, but analysis shows we are falling behind in achieving them. The new homes solar mandate, much like California's commitment to 100% carbon-free energy, set a national precedent. We made the commitment. Now it is time to deliver.

In November, the CEC postponed a vote on SMUD's SolarShares proposal, citing concerns that it would undermine the intention behind the new homes solar mandate and block the installation of solar and storage. While SMUD made some positive adjustments to their current proposal, there are unacceptable barriers to ongoing solar access on new homes.

Under SMUD's proposal and Commission regulations:

- It is misleading for SMUD to say that it is likely that more clean energy generation will occur with the SolarShares option, under current RPS rules. And it is almost certainly the case that SolarShares will lead to less battery storage on the system, meaning fewer clean virtual power plants, and more dirty peaker plants.
- The SolarShares program reduce removes the likelihood that incentives that encourage homebuilders will to install solar paired with batteries that would reduce peak demand and could provide backup power during emergencies.
- Homeowners enrolled in SolarShares would be effectively blocked from installing rooftop solar for 20 years.
- SMUD's control of the Sacramento electric distribution system prevents solar developers from offering competitive approaches to community solar. SMUD customers should have the option to take advantage of the built environment to support solar growth

The purpose of the CEC's new building standards is to promote sustainable neighborhoods and reduce the carbon footprint of homes throughout the state. The new standards support on-site solar as the preferred option, because it leverages consumer investment in the transition to fully electrified homes and cars. SMUD's SolarShares program limits consumer choice, rather than building on SMUD's commitment to reduce greenhouse gas emissions.

With battery storage, local solar can also deliver clean, resilient backup power for the millions of Californians facing significant threats from climate change. The increasing risk of power outages in California necessitates that we invest, not only in clean energy, but in resilient energy at the local level. SMUD's SolarShares program as currently designed would limit homeowners from investing in clean resilient solutions in their communities.

We urge you to work with stakeholders to improve SMUD's SolarShares program.

Sincerely,



Dan Jacobson,

Director