

DOCKETED

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*Comment Received From: Cindy Blain
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**California ReLeaf comments for 19-BSTD-08 SUPPORT for SMUD
SolarShares Program**

Additional submitted attachment is included below.



February 6, 2020

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

RE: SMUD's Neighborhood SolarShares Program – SUPPORT

Dear Commissioners,

On behalf of California ReLeaf – a statewide non-profit committed to supporting urban forests through the lens of climate change and social equity – I am writing to support the CEC Staff recommendation to approve SMUD's Neighborhood SolarShares Program. However, we strongly encourage the Commission to consider the SMUD application as a stand-alone proposal that will not be used to set precedent for other utilities suggesting lesser alternatives to meeting § 10-115 requirements. As noted in comments submitted by the Center for Biological Diversity, "SMUD's Revised Application is an improvement over the initial application." Numerous revisions have been made that speak directly to concerns raised over project size, location, and customer financial benefits. Moreover, the revised application transfers the opt-in decision-making to the homeowner, where it rightfully belongs.

Californians are justifiably concerned about the rocketing real estate prices for residential housing and are acutely aware of our state's homelessness crisis. As noted by Habitat for Humanity, the cost of rooftop systems can price prospective homebuyers out of an already high-cost, high-demand market – especially low incomes households. SMUD's Neighborhood SolarShares Program creates options and a viable alternative to the significant additional costs of rooftop solar that homeowners will face at point-of-purchase. The SolarShares Program offers the homeowner a guaranteed benefit every year that may or may not be comparable to rooftop solar, depending on energy usage and storage. Nevertheless, it is a guaranteed benefit.

Finally, as articulated by the Sacramento Tree Foundation in its comments, SMUD's Neighborhood SolarShares Program expands options for homeowners to utilize trees to achieve additional energy savings. Shade trees strategically sited at a home can reduce summer energy usage by 30% and offer myriad co-benefits related to human health, outdoor recreation, and community building that are simply not inherent to rooftop solar. NRDC asserts in their comments that "On-site, community, and utility-scale solar resources each have a role to play to maximize emissions reductions, affordability, resiliency, and public engagement benefits." We agree – and we recognize that urban trees have a critical role to play as well, which is why SMUD's Shade Tree Program is a model for how multiple energy conservation efforts can work together rather than compete.

For these reasons we strongly encourage the Commission to approve SMUD's application at its February 20, 2020 Business Meeting. Thank you very much for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Cindy Blain". The signature is written in a cursive, flowing style. A small "s" is written at the end of the signature.

Cindy Blain
Executive Director