

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-08
<b>Project Title:</b>	Community Shared System Applications
<b>TN #:</b>	231983
<b>Document Title:</b>	Coalition for Community Solar Access (CCSA) Comments - re Revised SMUD Community Solar Application
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Coalition for Community Solar Access (CCSA)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/7/2020 1:48:11 PM
<b>Docketed Date:</b>	2/7/2020

*Comment Received From: Coalition for Community Solar Access (CCSA)*  
*Submitted On: 2/7/2020*  
*Docket Number: 19-BSTD-08*

**CCSA Comments re Revised SMUD Community Solar Application**

*Additional submitted attachment is included below.*



PO Box 65491  
Washington, DC 20035  
202-888-6252  
info@communitysolaraccess.org  
communitysolaraccess.org

February 7, 2020

California Energy Commission  
Docket 19-BSTD-08  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

Re: Docket 19-BSTD-08

Dear Commissioners,

The Coalition for Community Solar Access (CCSA) provides these written comments to in response to the revised application (filed January 17, 2020) by Sacramento Municipal Utility District (SMUD) to be a Section 10-115 administrator for its proposed Neighborhood SolarShares Program (SolarShares).

CCSA is a business-led trade organization, comprised of over 50 member companies, that works to expand access to clean, local, affordable energy nationwide through community solar. CCSA's mission is to empower energy consumers, including renters, homeowners, businesses and households of all socio-economic levels, by increasing their access to reliable clean energy.

As stated in our October 9, 2019 comments, CCSA strongly supports the California Energy Commission's vision in the new building code, in which every new home in California is solar-powered. In addition to onsite solar, Section 10-115 creates an opportunity for participation in a community shared solar system to partially or totally meet the solar requirement. This section provides a compliance pathway for community shared solar programs that offer energy savings benefits to the building, the occupant, and the grid that are equivalent to an onsite solar (and/or storage) system.

SMUD's revised application for its SolarShares program is a significant improvement over the initial application submitted in September 2019, and better aligns with the aim to provide benefits equivalent to those resulting from onsite solar for new, low-rise residential buildings. Most notably, the proposed changes to prioritize new resources that do not exceed 20 MW and are located in SMUD territory address many of the concerns CCSA raised in the comments submitted in response to the initial application.<sup>1</sup> As such, CCSA supports SMUD's revised application.

That said, CCSA offers several clarifications and recommendations for SMUD and the Commission to take into consideration with regards to this and future applications:

---

<sup>1</sup> CCSA Comments. October 9, 2019.  
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=230083&DocumentContentId=61600>

- **Projects should be on the distribution system.** CCSA appreciates SMUD’s proposed change to limit projects to 20 MW in size, and also SMUD’s reference to CCSA’s “Community Solar Policy Matrix” in providing additional justification for that sizing.<sup>2</sup> However, SMUD failed to acknowledge that CCSA also makes clear that projects should be on the distribution system. The CCSA Matrix offers the following rationale for project sizing: “The project size should be set high enough to allow projects to achieve economics of scale, but low enough to still be considered a distribution-scale project.” This prerequisite ensures that generation benefits are provided at the local level, akin to onsite solar. SMUD Staff have confirmed that the Wildflower project is in fact on the distribution system. We recommend SMUD incorporate that criteria when considering future capacity additions for its program. Note that CCSA acknowledges that some flexibility may be appropriate (on size, location, and existing versus new resources) to bridge gap periods, however the underlying intent should always be to return to the initially preferred project eligibility criteria. We recommend the Commission also clarify that compliance with Section 10-115 should be focused on projects located on the distribution system.
- **Further enabling customer choice and market competition should be a priority.** CCSA appreciates SMUD’s openness to “consideration of VNEM” [Virtual Net Metering] as part of its solar review process, and greatly encourages that investigation. In fact, VNEM represents the most “equivalent” compliance option relative to onsite solar. Further, without VNEM or other mechanisms for third-party engagement, SMUD’s program will spur minimal economic development and competition, and in turn limit customer choice and prevent market innovation and cost reductions from being achieved. Third-party market actors can also bring additional resources, partnerships, and experience toward meeting policy objectives around participation and benefits for disadvantaged communities. Likewise, the Commission should be encouraging and/or enabling opportunities for a diverse market and associated competition. We support the recommendation offered in Vote Solar’s comments for the “Commission to articulate that it would like to see that there are multiple options for off-site compliance with the Building Standards.”<sup>3</sup>

CCSA applauds the Commission’s inclusion of the “Community Shared Solar” compliance option, which was clearly a deliberate attempt to allow alternative development options that closely align with onsite solar.

Respectfully submitted,

/s/  
Charlie Coggeshall  
Coalition for Community Solar Access  
[charlie@communitysolaraccess.org](mailto:charlie@communitysolaraccess.org)

---

<sup>2</sup> SMUD’s Revised Application. See pg. 10 and pg. 32 and footnote 23.

<sup>3</sup> Vote Solar Comments. January 28, 2020.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=231764&DocumentContentId=63605>