

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-08
<b>Project Title:</b>	Community Shared System Applications
<b>TN #:</b>	232265
<b>Document Title:</b>	Donald Osborn Comments - SMUD Solar Shares
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Spectrum Energy Development Inc/Donald Osborn
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/28/2020 3:12:55 PM
<b>Docketed Date:</b>	2/28/2020

*Comment Received From: Donald Osborn  
Submitted On: 2/28/2020  
Docket Number: 19-BSTD-08*

## **SMUD Solar Shares**

*Additional submitted attachment is included below.*

Donald E Osborn, President, Spectrum Energy Development Inc  
[Deosborn.solar@gmail.com](mailto:Deosborn.solar@gmail.com), 916-213-5978

First off, I would like to point out that the ILSR, the nations foremost prompter and advocate for Community Solar has this to say about SolarShares "However, SolarShares should NOT be mistaken for a community solar program". I have submitted copies of their detailed analysis and concerns.

The SolarShares program, as proposed by SMUD, would gut the Solar On New Homes Mandate before it even gets a chance to really start.

The SolarShares program is the opposite of customer choice -- it will be nearly impossible for many customers to go solar or solar+storage for 20 years. SMUD's plan to offer home buyers a point of purchase option on rooftop vs. SolarShares is problematic at best. Indeed, if "rooftop" solar is to become just another option again, why bother with a "solar on New Homes" mandate, just require an equivalent increase in the RPS because this is what SolarShares effectively is and what the On Site Mandate would become.

SolarShares will likely become the default option for many multi-family homes because SMUD doesn't allow VNEM unlike 80% of the rest of the State despite the crys for it by the Sacramento Affordable Housing Community. This is a major equity issue. While CEC can not dictate rates to SMUD, you do NOT have to reward this bad behavior.

\*\*\*

The newest SolarShares proposal does not address Commissioner Scott's concerns that SolarShares would be an immense administrative burden and an actual cost burden. SMUD complains about the administrative costs of VNEM but seem happy to adopt a much more costly admirative burden for SolarShares.

SMUD falsely claims that SolarShares helps with housing affordability but the CEC's own analysis says otherwise. *"a home with solar costs less to own than one without. Put another way, the benefits of solar outweigh its costs, such that the new homeowner is saving money from day one in the home. That family will save thousands of dollars over the first decade of ownership."*

While offered by all the IOUs including PG&E, SMUD does not allow VNEM, which is a simple low-cost method of getting solar on multifamily apartments and getting that benefit to the tenants. This is particularly important for affordable housing. I can tell you that your affordable housing development community is up in arms over this but to no avail with SMUD.

Insist that before you approve this poorly thought out proposal that SMUD adopt pro-rooftop solar and energy storage polices including but not limited to a positive Net Energy Metering 2.0 decision and Virtual Net Energy Metering (VNEM) for multifamily housing so solar can be added to those apartment buildings and tenants can get the direct benefit of solar. SMUD should be a leader in promoting these technologies for their customers.