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## **cost effectiveness of Title 24 PV requirement**

I appreciate the opportunity to comment on Trinity PUD's request for an exemption from the solar requirement in the 2019 Residential Standards. I am sympathetic to TPUD's arguments, but I feel that an exemption is not warranted for several reasons.

1. PV can provide a measure of resiliency in the event of electrical outages such as happen with wildfires or efforts to avoid wildfire risks (e.g., the Carr fire). Trinity's customers will be safer with installed PV as the risk of wildfires increases due to climate change.
2. The bulk of TPUD's "renewable" power comes from large hydro power plants. Their ability to meet TPUD's needs will also be affected by climate change. There is no guarantee that WAPA can continue to supply the same level of service while rivers levels decline.
3. Other than the system access charge, the rate sheet provided by TPUD provides only the base usage charges. In evaluating TPUD's claim that their residential charges are significantly lower than the rates upon which the CEC relied in its evaluation of cost-effectiveness, I urge the Commission to review the full cost of electricity to TPUD's residential customers.
4. One of the thrusts of the 2019 Standards update and the next iteration is to decarbonize the building stock. Residential rooftop solar is an essential part of that. Granting this exemption would set a terrible precedent that would tend to weaken the State's resolve to address GHG emissions through building decarbonization.

As an alternative, I recommend that the CEC find a way to help TPUD develop a solar incentive program that will help offset some of the cost of PV installations.