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Obtaining the energy saving benefits of JA1151 requirements, BSTD-19-08

Obtaining the energy saving benefits of JA11.5.1 requirements

Dedicated Building Energy Savings Benefits. The community shared solar electric generation system shall provide energy saving benefits directly to the building that would otherwise have been required to have an onsite solar electric generation system. See 24 CCR 10-115 (a) (3).

Perhaps the bulk of actual reductions in energy consumption of the dedicated building yielded by onsite solar electric generation systems are the result of the benefits that come from the capabilities JA11.5.1 requires.

SMUD's application does not directly address JA11.5.1 requirements.

Systems such as WREGIS don't appear to comply with JA11.5.1 and have costs that must be considered that are not required of onsite solar electric generation systems.

Net metered electricity is not consumed as a retail sale, any costs related to ensuring that the electricity is not attributed to the benefit of any other purposes or transferred to other buildings or property must be considered.

The specific share of the Community Shared Solar Electric Generation System must provide the benefits to the dedicated building that are in no way made available or attributed to any other building or purpose. See 7.4.6 of CEC-400-2018-017-CMF.pdf.

SMUD's application appears to be relying on regulations that are yet to be adopted, such as implementation of PUC 399.21. (a) (1), 399.30. (c) (4) and 399.13. (b). All of which the Energy Commission shall adopt regulations specifying procedures for enforcement of as expressly required by PUC 399.30. (n) to be adopted pursuant to GOV 11346 (a).

The Energy Commission should also consider any requirements to waive any advantage in laws intended to provide consumer protection. The Energy Commission should review SMUD rules implementing PUC 12823. (d).

Commissioners do not approve any application such as SMUD's application in the proceeding docketed as 19-BSTD-08 or any other proceeding, prior to ensuring JA11.5.1 requirements shall provide energy saving benefits directly to the building that would otherwise have been required to have an onsite solar electric generation system and any expressly required regulations are adopted that may effect the costs attributable to the community shared solar electric generation system.

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