

**DOCKETED**

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**Sacramento Municipal Utility District (SMUD) Application to Administer a  
Community Shared Solar System (# 19-BSTD-08)**

*Additional submitted attachment is included below.*



October 8, 2019

TO: California Energy Commission

RE: Sacramento Municipal Utility District (SMUD) Application to Administer a Community Shared Solar System (# 19-BSTD-08)

Dear Commissioners:

Solar Rights Alliance respectfully asks you to oppose the Sacramento Municipal Utility District's (SMUD) proposal to meet the state's new Solar Homes requirement through SMUD's *SolarShares* program. We also ask you to extend the public comment period for this proposal beyond the current deadline of October 9.

Solar Rights Alliance is a nonprofit association of California solar users, including hundreds of homeowners, renters and businesses in SMUD's service territory. We believe everyone has the right to make and store their own energy from the sunshine that falls on their property without unreasonable interference by the utility.

Last year, we cheered the Commission's decision to create the Solar Homes requirement. Installing solar at the time of construction significantly reduces the upfront cost of solar while helping consumers save money and protect the environment. We were also happy to see that the Solar Homes plan includes incentives to include battery storage, helping new residents get even more savings and insulate themselves from power outages.

As we see it, the California's Solar Homes program would not only benefit new homeowners and renters, it would also benefit the community in the form of reduced pollution, reduced burden on the central grid, protection of open space, and increasing local sources of clean energy that SMUD can draw upon rather than investing in expensive new centralized power.

**We thank you for your actions last year, and wish to alert you that SMUD's *SolarShares* proposal will undermine your Solar Homes program. In the process, SMUD's proposal will deny homeowners and renters the chance to see significant energy savings.**

At its essence, SMUD's proposal allows builders to sidestep the Solar Homes requirement and instead enroll new home residents in SMUD's *SolarShares* program for twenty years. SMUD claims their plan is better because they will supply energy from SMUD's solar farms.

But *SolarShares* isn't a better deal at all. The savings offered to these residents will be around \$5 per kW per year, or around \$20 per year. This is a laughable savings compared to what these customers would receive under your original Solar Homes requirement.

Equally important, SMUD's proposal will make it harder for these new residents to add solar and storage to their homes later on. That's because SMUD only allows residents to size their systems to meet historic energy use, and will subtract the amount of solar energy they are already locked into through the *SolarShares* program.

**This is a major no-no. Everyone should have the right to make solar energy on their property to meet their own on-site energy needs if they want. At a time of skyrocketing electricity prices, blackouts and environmental concerns, there is no good reason to restrict people's ability to use their own money and property to create more clean energy.**

We have no problem with SMUD investing in solar farms. They must do this anyway in order to meet the state's clean energy targets. But it makes no sense to restrict the growth of rooftop solar towards this end. Indeed, more rooftop solar and storage helps SMUD by reducing the amount of central capacity they must build.

Your Solar Homes plan captured the imagination of the nation, and world, by making the clean energy homes of the future a reality now. SMUD's proposal would undermine your accomplishment in one fell swoop, and leave new homeowners, new renters and our community worse off as a result.

Thank you for considering our position,

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