

**DOCKETED**

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*Comment Received From: Donald E Osborn*  
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**re 19-BSTD08 SACRAMENTO MUNICIPAL UTILITY DISTRICT  
APPLICATION TO ADMINISTER A COMMUNITY SHARED SOLAR  
SYSTEM**

*Additional submitted attachment is included below.*

October 9, 2019

Re: 19-BSTD-08: SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD)  
APPLICATION TO ADMINISTER A COMMUNITY SHARED SOLAR SYSTEM  
SMUD  
SolarShares Proposal for T-24 PV Requirements

To the CEC Commissioners,

I appreciate this opportunity to discuss the issues of concern surrounding SMUD's Proposal for its SolarShares Program as a compliance path to meet the new Solar On New Homes Mandate of T-24 being considered by the Commission.

I am writing today because I am concerned that our own SMUD may undo much of the good work getting started by the Solar On New Homes Mandate (T-24). SMUD's proposal for their community solar program to meet the requirements of the new home solar mandate threatens the mandate statewide. If the Commission approves the proposal, it will set the standard that utilities can meet the new home solar mandate by counting existing capacity on large solar farms hundreds of miles away.

I ran the SMUD Solar Programs in SMUD's haydays of 1991 to 2002 when SMUD was the undisputed leader in the commercialization of PV, especially distributed PV ("rooftop" or DGPV). So I treasure the groundbreaking work we did at SMUD back then. Since then, SMUD has seriously backtracked on its support of DGPV and customer choice to "go solar". This came to a head earlier this year when SMUD attempted to impose very regressive and discriminatory "grid access fees" that would have killed customer owned solar in Sacramento and would have further encouraged this trend by other utilities throughout the State. SMUD backed down (for now) only due to overwhelming and loud customer opposition.

I know that we all want to believe that SMUD is a Great Green Knight doing good for us all. And while SMUD does many things well, its pro-solar reputation largely rests on past glories and NOT on its recent and current actions. This includes SMUD's continued reliance on fracked natural gas and its on-going push back against customer owned/sited solar.

You are now being asked to approve the SMUD SolarShares Program to be a path for developers of new homes AND new multifamily housing to meet the new T-24 Solar On New Home Mandate as "an alternative" to including on-site solar. While we fully support "Community Solar" programs and the use

of them as an alternative to on-site solar when necessary, SMUD's proposed program should fail to earn your support for many reasons. These include:

- Due to SMUD's refusal to allow Virtual Net Metering (VNM), the proposed SolarShares program would in effect be the only practical avenue to meet the T-24 PV mandate for new multifamily housing as opposed to on-site solar. That is clearly not the goal of the PV mandate.
- SolarShares provide no significant savings to either developer or tenants, SMUD admits the savings to be only about \$5/kW per YEAR. On-site, customer owned solar can provide significantly greater savings while also providing a range of distributed benefits. These savings, both for the solar customers and all customers at large, can be further enhanced by solar+storage. In addition, due to SMUD's on-site solar sizing limitations, customers locked in to the 20 year SolarShares commitment would prevent the customer of adding an on-site solar or solar+storage system including systems that could provide energy during Fire Hazard power shut-offs.
- SolarShares would not be served by new solar but by SMUD's existing solar power plants located far from the end users. This seems to clearly violate the intent of the Mandate and of the additionality criterion of the program.
- SMUD's proposal perverts the whole concept of "community solar" which was intended to be mid-size solar fields close to the users to obtain locational and distributed benefits while supplying solar to those who can't go solar due to lack of roof space, shading, and other factors. Approval would also jeopardize the whole Community Solar effort.
- Despite SMUD being a public, customer owned utility, SMUD insisted on creating their Plan shrouded in secrecy and refused to share drafts of it with any of us who are customer-owners. Indeed, despite repeated requests, we were only able to see the actual plan when it was posted on the CEC website.
- Most importantly, approval by the CEC for SMUD's SolarShares Program as it is proposed to meet T-24 Solar On New Homes Mandate would gut the new mandate and that would quickly spread to other munis and Irrigation Districts who are watching closely. It may even spread to IOUs who continue to look for ways to slow or stop the spread of customer owned solar through greatly increased fixed fees and/or discriminatory solar fees (for example the current request by SDG&E). SMUD should not be allowed to undermine the Solar on New Homes Mandate.

I strongly urge you to use your discretion and influence to either reject SMUD's ill-conceived SolarShares Program or at least send it back to SMUD for further rework and encourage them to work with the community to craft a better plan in line with the goals of the CEC Solar On New Homes Mandate including urging the adoption of VNEM for multifamily housing. I do believe that if this happens, the SMUD Board would take notice and work to make SMUD's policies more supportive of distributed solar. It is vital that we make sure the Solar On New Homes Mandate is made a reality and not seriously weakened before it even implemented.

Please feel free to contact me with any questions or concerns you may have. I do plan to attend and speak at the Business meeting when this is on the agenda.

***Don***

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