

**DOCKETED**

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<b>Project Title:</b>	Community Shared System Applications
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<b>Document Title:</b>	Aurora Solar Inc Comments - SMUD Application to Administer a Community Shared Solar System
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*Comment Received From: Aurora Solar Inc.  
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**19-BSTD-08, and SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD) APPLICATION TO ADMINISTER A COMMUNITY SHARED SOLAR SYSTEM**

Dear California Energy Commission (CEC) Staff,

Thank you for making the Sacramento Municipal Utility District's (SMUD) application to administer a community shared solar system (docket #19-BSTD-08) public for review and for comments.

I'm submitting these comments on behalf of Aurora Solar Inc., a solar design and sales software company based in San Francisco, California. Aurora Solar Inc. respectfully recommends CEC to reconsider approving SMUD's Community Shared Solar Electric Generation System application to administer the Neighborhood SolarShares Program.

This program will bind each participating customers and all owners and tenants (original occupant and subsequent occupants) who occupy the property for a minimum of 20 years without an option to opt out and regardless of whether or not the residential projects are conducive to on-site solar.

By approving SMUD's application as written, it will (1) create a loophole to CEC's building standards requiring solar photovoltaic systems on all new homes starting in 2020, (2) discourage new solar projects in Sacramento neighborhoods, and (3) severely limit all energy consumers' (homeowners and tenants) solar options and take away their ability to make financially more beneficial decisions.

Additionally, SMUD proposes using existing projects under construction; prices used for this program will be based on the current market. The cost of solar installations will likely continue to decrease over time, which in turn, would make the Neighborhood SolarShares program financially less attractive.

Thank you again for the opportunity to submit comments.

Respectfully,  
Aurora Solar Inc.