

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-08
<b>Project Title:</b>	Community Shared System Applications
<b>TN #:</b>	230580
<b>Document Title:</b>	Sierra Club CA opposing comments on SMUD community solar proposal
<b>Description:</b>	N/A
<b>Filer:</b>	Lauren Cullum
<b>Organization:</b>	Sierra Club California
<b>Submitter Role:</b>	Other Interested Person
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November 11, 2019

California Energy Commission  
1516 9th Street  
Sacramento, CA 95814

Docket number: 19-BSTD-08

**Subject: Sacramento Municipal Utility District (SMUD) Application to Administer a Community Shared Solar System--OPPOSE**

Dear Commissioners:

Sierra Club California submits these comments on Sacramento Municipal Utility District's (SMUD) proposal under which it seeks to use its existing SolarShares to satisfy Title 24 regulations. This proposal would render the new rooftop solar mandate meaningless. We urge the California Energy Commission (Commission) to reject this application for the following reasons:

**1. SMUD's proposal is an improper manipulation of the Title 24 regulations.**

This proposal would allow SMUD to rely on its existing utility-scale solar projects to count towards compliance under the solar mandate. The proposal will count certain SMUD projects, such as the 160 MW Rancho Seco project towards compliance, which were already under development well before SMUD's application for this proposal was submitted.

SMUD wrongfully calls its projects under this proposal "community solar." However, they are not. For example, the Great Valley Solar 2 (60 MWs belonging to SMUD) project is located 135 miles outside of SMUD's service area, clearly sits outside of the community. Other SMUD utility-scale solar plants it would like to be considered "community solar" are tens and hundreds of miles away from the communities they serve. This could not possibly be the type of "community solar" programs envisioned by the Commission when in fact the term is generally understood to mean small solar farms serving local communities.

**2. SMUD's proposal directly contradicts the Commission's goals**

The Commission enacted the solar mandate to encourage the expansion and development of solar energy and storage across the state that will support California's transition off of fossil fuels.

Community solar plants and community shared storage can greatly help California especially amidst the wildfires and shut offs and general instability of our grid. The Commission understandably wanted to allow for community solar programs to be included within the mandate and not be overly prescriptive for those homes/buildings who could not support rooftop solar because of shade, etc. However, the underlying goal was to still promote zero net energy buildings and not allow a loophole for utility-scale solar to be used at the expense of community solar development.

SMUD's proposal undermines the solar mandate and the Commission's energy goals. SMUD will use this proposal to repurpose utility-scale solar capacity that would have been built with or without the solar mandate. These types of projects would be located so far away from the community they serve that they would not even deliver the customer benefits, such as savings, local clean energy, and resilience, that were outlined in the intention of the Title 24 regulations.

### **3. Conclusion**

Approving SMUD's proposal will set a dangerous precedent in California. This proposal will pave the way for other utilities to submit similar proposals leading to a complete upheaval of the rooftop solar mandate. The plan would end up blocking the development of new community solar and storage to the local grid at a time when our state needs it.

Again, Sierra Club California strongly urges the Commission to disapprove SMUD's application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Cullum', with a long, sweeping horizontal line extending to the right.

Lauren Cullum  
Policy Advocate