

DOCKETED

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19-BSTD-08, SMUD - COMMUNITY SHARED SOLAR SYSTEM

The SMUD application to use *EXISTING* off-site solar to meet requirements for solar power on new housing is not appropriate. If it were for *NEW* off-site solar, that would be appropriate. Recharacterizing existing solar for this program doesn't actually produce any new power to offset the usage of the new housing.