

DOCKETED

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On SMUD Application to Administer a Community Shared Solar System

Additional submitted attachment is included below.



November 12, 2019

California Energy Commission
Docket number: 19-BSTD-08
1516 9th Street
Sacramento, CA 95814

RE: Sacramento Municipal Utility District (SMUD) Application to Administer a Community Shared Solar System

Dear Commissioners:

I am writing on behalf of Environment California to oppose the proposal to allow the Sacramento Municipal Utility District to escape from the Solar Roofs program that the Commission passed last year. This program is often referred to as the SolarShares program. Environment California is in opposition to SMUD's Community Shared Solar Electric Generation System ("SolarShares") application.

As every one of the commissioners know, we are in a long hard struggle to stave off the worst impacts of climate change and to promote a more resilient grid with more clean, distributed power. While we strongly support community solar, it should not supplant progress on onsite renewable energy.

Each of you have made remarks and been bold in your statements about the need to move to 100% clean energy and to do it quickly. These comments are important not just because they help to move more clean energy in California but also because they give hope to the rest of the country and the world that California, the fifth largest economy, can get to 100% clean energy and guide the way for the rest of the planet.

When this commission adopted the solar home mandate it was applauded because it would help reduce our GHG emissions, it was historic in scale and it was the right thing to do. The program will ensure that we put solar on new homes built in California starting in 2020.

For too long we have ignored the benefits of rooftop solar. We wrote a report that details all the benefits of rooftop solar. Here is a [link to the report](#) -- I wish to include the report as part of my comments.

I am including a chart from our report about the benefits of rooftop solar below:

Benefit Category		Benefit
Grid	Energy	Avoided electricity generation
		Reduced line losses
		Market price response
	Capacity and Grid Investments	Avoided capacity investment
		Avoided transmission and distribution investment
		Reduced need for grid support services
	Risk and Reliability Benefits	Reduced exposure to price volatility
		Improved grid resiliency and reliability
	Compliance	Reduced environmental compliance costs
	Societal	Environment
Avoided air pollution		
Health benefits		
Avoided fossil fuel lifecycle costs		
Economy		Local jobs and businesses

One of the smart aspects of your program is that it allows an exception for certain homes that are shaded or unable to install solar. This is smart and makes sense.

However, allowing a whole utility to get out of the program is not a good idea. First of all we need to be putting up more solar on roofs, not less. Secondly, as you know, this will lead to other utilities asking for the same exception (what's good for the goose is good for the gander). In other words, you are going down the wrong path.

Distributed solar energy is on the rise, generating enough electricity to power more than 6 million homes each year, and resulting in annual carbon dioxide emission reductions equivalent to taking 4.4 million passenger vehicles off the road. Public policy has been a key factor in driving the growth of solar energy – recognizing the enormous benefits that solar power can provide both today and in the future.

For the sake of the climate, please reconsider this proposal and ensure that all new homes built in California after 2020 have solar panels.

Thank you,

Dan Jacobson

A handwritten signature in black ink that reads "Dan Jacobson". The signature is written in a cursive style and is positioned to the left of a vertical line.

Director
Environment California