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From: Lynn Jurich <lynn@sunrun.com>
Date: November 8, 2019 at 10:22:01 AM PST
To: "McAllister, Andrew@Energy" <andrew.mcallister@energy.ca.gov>
Subject: SMUD and Title 24

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Commissioner Mcallister:

I'm writing to express my strong opposition to SMUD's application which proposes to use the SolarShares program to comply with 2019 Title 24 requirements.

A year and a half ago, Sunrun, along with the rest of the solar industry, applauded the CEC's unanimous approval of the Title 24 standards which required new homes to have solar installed beginning in 2020. We are grateful for your personal leadership in making this policy a reality and having the courage to place California at the forefront of making clean solar energy and battery storage a standard feature in new homes.

Now more than ever, in the face of increasingly prevalent, days-long outages due to wildfire threats, solar and storage needs to be deployed on homes to keep the lights on, build local resiliency, and adapt to the changing climate conditions in California. SMUD's proposal does nothing to help families become more resilient in the face of future shutoffs. It would undermine the forward-looking direction the CEC set when it approved the new Title 24 standards in the first place. Moreover, if approved by the CEC, SMUD's proposal sets a dangerous precedent that the investor-owned utilities and other municipal utilities will replicate at the expense of home and community resiliency.

The Title 24 new homes requirement sent a strong statement to the entire country about California's leadership on climate change and clean energy. It also made clear the critical role that peoples' homes can play in reducing carbon pollution while supplying local community resiliency without overbuilding the transmission grid. Finally, the new requirement need not add to the cost of building a home. Throughout California, solar providers are paying builders for access to these roofs if they opt into a third-party lease or PPA. This makes it simple, affordable, and the right solution for Californians, especially in light of the dangerous measures utilities must regularly take to avoid wildfire risks.

SMUD's Solar Shares proposal is a step backward. That is why I strongly urge you to oppose SMUD's proposal and help ensure that the policy you created helps more Californians become cleaner and more resilient.

Thank you.
-Lynn Jurich

 **Lynn Jurich**
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