

DOCKETED	
Docket Number:	19-BSTD-08
Project Title:	Community Shared System Applications
TN #:	230684
Document Title:	Rosalie Yacoub Comments - California Needs Solar Roofs
Description:	N/A
Filer:	System
Organization:	Rosalie Yacoub
Submitter Role:	Public
Submission Date:	11/14/2019 9:01:27 AM
Docketed Date:	11/14/2019

Comment Received From: Rosalie Yacoub
Submitted On: 11/14/2019
Docket Number: 19-BSTD-08

California Needs Solar Roofs

Additional submitted attachment is included below.

From: [Rosalie Yacoub](#)
To: [Energy - Docket Optical System](#)
Subject: Docket 19-BSTD-08: California Needs Solar Roofs
Date: Wednesday, November 13, 2019 9:05:21 AM

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California Energy Commission

RE: Docket 19-BSTD-08: California Needs Solar Roofs

null

California Energy Commission,

I read SMUD's proposal, and it doesn't say that SolarShares is a requirement, so I am guessing a builder COULD choose to install vs. enroll (but why would they). Concerning to me is that the SolarShares is being proposed as a way to satisfy a *local* solar generation *requirement* that was designed to be split between the builders and the utility; and altering it so it doesn't have to be

1. Local : current portfolio shown in appendix B includes Great Valley Solar in Fresno County.

2. Required for builders to bear the expense, the utility to pay for the power, leaving the buyer to experience as benefit: A participating builder *may* buy down the cost of the SolarShares@generation allocated to the participating home through an up-front origination fee paid to SMUD. If a buy down is provided, SMUD will apply the fee to reduce the SolarShares Charge(or increase the SolarShares Credit) to participating customers to provide a customer experience of a larger net benefit on the participant's bills in each year of the 20-year term

Now I get that SMUD having to pay a customer the retail rate for solar that the customer doesn't use (they are not home when generation occurs) is not a great deal for the utility, and could impact rates (though I am not sure that would be a big deal). But this change also could change the availability of local solar to support existing housing and buildings. Would new housing take up all the local capacity mean that people like me won't be able to use SolarShares? I recently asked a SMUD representative about SolarShares and was told there was no program--is this why (they plan for it all to be taken up with new housing)? Using existing rooftops may not be as 'efficient', but not using them is not land efficient. It postpones SMUD's need to deal with the storage issue sooner. And it gives all the benefit of longer lived systems to the utility (the customer is out of the program in 20 years, but the solar equipment can definitely last longer). Don't get me wrong, the concept of SolarShares is a good one, especially good for existing housing stock in areas that are difficult to retrofit with solar.

This proposal is a test of the intent of the new home policy, not an innovative way to follow it.

Sincerely,

Sincerely,
Rosalie Yacoub