

**DOCKETED**

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*Comment Received From: Steven Kelly*  
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**IEP Support for Approval of SMUD's Neighborhood Solar Shares Program**

see attachment.

*Additional submitted attachment is included below.*

# INDEPENDENT ENERGY PRODUCERS

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November 25, 2019

California Energy Commission  
Docket 19-BSTD-08  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Support for Approval of SMUD's Neighborhood SolarShares Program**

Dear Commissioners:

The Independent Energy Producers Association (IEP) expresses its support for the SolarShares Program proposed by the Sacramento Municipal Utility District (SMUD) for which SMUD would be the administrator. Specifically, the SolarShares Program envisions enrolling a group of residential buildings in a Commission-approved community solar program as compliance with the 2019 Building Standards. IEP's understanding is that the SolarShares Program has been designed working closely with Commission staff, and the SolarShares Program was recently submitted for the Commission's review and approval consistent with the rules and regulations governing Section 10-115 of the 2019 Building Standards.

**The SolarShares Program provides needed choice with regards to complying with Section 10-115 of the 2019 Building Standards.** The SolarShares Program is an innovative approach to simplifying the means by which builders and residential consumers can comply with Section 10-115 of the 2019 Building Standards. Essentially, the program enables builders and residential customers the option to access solar generation for their residential use if the community shared solar option meets the requirements of the 2019 Building Standards and is approved by the Commission. Not all builders and residential consumers will engage the SolarShares Program; yet, many may choose to participate in this innovative program for a variety of reasons. Importantly, however, this valuable option will not degrade the state's commitment to the development of durable solar resources that provide additional benefits to consumers. For example, the SMUD SolarShares Program maintains a commitment to the Durability [Section 115(a)4] and Additionality [Section 115(a)5] requirements of Section 115 of the 2019 Building Code.

**The SolarShares Program will help lower barriers to solar development needed to achieve GHG and RPS policy objectives.** The SolarShares Program vastly simplifies the participation of builders and residential customers in the solar build-out needed to meet the state's dual 2030 policy goals of lowering GHG emissions and fostering retail sales from RPS-eligible renewable resources. As a result, the SolarShares Program will be a significant catalyst to fostering innovation and capital investment needed to achieve the significantly higher levels of solar

penetration over the next decade needed to meet state Greenhouse Gas (GHG) emission reduction targets and Renewable Portfolio Standard (RPS) requirements.

**The SolarShares Program will enhance transparency and accounting of solar generation.**

SMUD will supply the SolarShares from a portfolio of solar resources and allocate the generation to participating homes. Importantly, the generation will be metered and tracked consistent within the Western Renewable Energy Generation Information System (WREGIS) and certified by the Center for Resources Solutions or the equivalent. This commitment is critical to ensuring transparency, avoiding double-counting, and minimizing the risk of “contract shuffling” in GHG accounting. Moreover, the SMUD SolarShares Program commits to demonstrate that the program provides the same or better energy performance of the onsite solar electric generation and/or battery storage that would otherwise have been required for individual buildings.

The SMUD Solar Share Program is an innovative proposal to provide the community solar compliance option envisioned in the Standards. The program, developed by SMUD working closely with Commission staff, offers unique value and significant savings in complying with Section 10-115 of the 2019 Building Standards. IEP’s member companies and their employees are ready and able to help develop the solar resources that will arise as a result of the Commission’s adoption of the Solar Share Program. The Commission should move ahead and approve the Solar Share Program without further delay.

Respectfully submitted,

A handwritten signature in black ink that reads "Steven Kelly". The signature is written in a cursive, flowing style with a large, sweeping underline.

Steven Kelly, Policy Director  
Independent Energy Producers Association (IEP)  
PO Box 1287  
Sloughhouse, CA 95683  
[steven@iepa.com](mailto:steven@iepa.com)