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**RE Community Shared Solar System (SMUD) Docket 2019-BTSD-08 -
SUPPORT**

Additional submitted attachment is included below.

POLITICO GROUP

January 27, 2020

California Energy Commission
1516 9th Street
Sacramento, CA 95814
Docket 2019-BSTD-08

RE: Community Shared Solar System (SMUD). Docket 2019-BTSD-08. - **SUPPORT**

I am writing on behalf of the California Chapters of the National Electrical Contractors Association (NECA) in support for the Community Shared Solar Electric Generation System Application submitted by the Sacramento Municipal Utility District ("SMUD"). NECA has 16 regional chapters and represents over 1200 electrical contractors throughout the State of California who perform a wide variety of electrical work from residential and commercial to small and large-scale energy generation, distribution and storage projects. NECA members include both C-10 electrical and C-46 solar licensed contractors and install both rooftop and utility scale solar energy systems. NECA has long been a leading supporter of legislative efforts to increase both solar and energy storage capabilities in California in order to address climate change.

SMUD is applying to administer a community solar program option meeting the requirements under Section 10-115 of the 2019 Building Standards. Section 10-115 allows a community solar program that meets Community Shared Solar Electric Generation System requirements to be used by a builder/developer as a compliance alternative to the onsite or rooftop photovoltaics required by Section 150.1(b)1. NECA supports allowing community solar programs to include participation in utility scale solar projects that are more cost-efficient and can provide greater benefits to homeowners. Utility scale solar provides benefits beyond that of rooftop solar including eliminating the risk of lost generation from rooftop maintenance and performance issues, allowing for "tree-friendly" developments, and costing less per kW. SMUD's proposal adds the additional benefits of guaranteed solar generation levies for twenty years, and a solar allocation during rainy or cloudy periods.

We appreciate that SMUD is committed to being a responsible administrator of a community solar program in the Sacramento area. SMUD has engaged with stakeholders and has been responsive to their requests in preparing their amended application. They have made several changes to their application to address the preponderance of the opposition's concerns.

- All resources used for SolarShares will be located in SMUD's service territory.
- SMUD will only use local solar resources that are 20 MW or less with backup from other local portfolio resources.
- The net participant benefit will be doubled to \$40 a year for an average home (from \$5 per kW per year to \$10 per kW per year).
- SMUD will only use resources that come on-line after January 1, 2020 with backup from other local portfolio resources.
- SMUD will work with participating developers/builders so that builders can offer a point of purchase choice option for prospective homebuyers.

Our members have experience working with community solar projects like the SMUD Rancho Seco II project and with installing rooftop solar directly on buildings. NECA believes there is a need for diverse options to help meet carbon reduction goals and that community solar can provide a stable cost-effective solar development option that can be located and oriented to better meet community or system grid needs.

Ultimately, the goal of Section 150.1(b) is to reduce energy demand and reduce greenhouse gas emissions, not to just replace more economic utility scale solar energy systems with rooftop systems. NECA's contractors have, and will continue to, install both types of systems. Innovative programs to more efficiently meet new construction energy requirements should be encouraged, particularly for low-rise multi-family developments affected by the Standards, where space for on-site solar may be scarce.

For these reasons, the California Chapters of the NECA strongly supports SMUD's Neighborhood SolarShares Program. We encourage you to approve SMUD's application at the Commission's February Business Meeting.

Kindest regards,



Eddie Bernacchi
Legislative & Regulatory Advocate