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**NCPA Support for Approval of SMUD's Application to Administer a
Community Shared Solar System**

Additional submitted attachment is included below.



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January 29, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Sacramento Municipal Utility District Application to Administer a Community Shared Solar System (Docket: 19-BSTD-08)

Dear Commissioners,

The Northern California Power Agency (NCPA) is pleased to express our support for the revised application of the Sacramento Municipal Utility District (SMUD) to administer a community-shared solar system as an alternative to the onsite photovoltaic requirements for newly-constructed residential buildings, as required by the 2019 Building Energy Efficiency Standards Code. We agree with the CEC staff recommendation and urge the Commission to approve SMUD's application, when it is considered at the February 20th Business Meeting.

NCPA is a not-for-profit Joint Powers Agency established in 1968 to make joint investments in energy resources that would ensure an affordable, reliable, and clean supply of electricity for customers in its member communities. NCPA's 16 members include municipalities, a rural electric cooperative, a port, public transit district, and a public utility district.¹ Like SMUD, we are committed to providing clean, renewable power in a safe, environmentally responsible, and cost-effective manner. The governing boards of our member communities are dedicated to this commitment, while at the same time working to ensure that the costs are borne equitably among customers. We applaud SMUD for designing an innovative program that both provides participants with a lower-cost way of obtaining additional, durable solar power without shifting the financial burden to SMUD's other customers.

¹ NCPA members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, the Truckee Donner Public Utility District, and the Plumas-Sierra Rural Electric Cooperative.

Many of the points SMUD makes in its application are the same reasons that NCPA members are now considering community solar as an option for members participating in NCPA's own solar program.² Participants in SMUD's program will receive additional, durable, renewable power from off-site solar arrays. Because they are off-site, panels can be optimally placed and positioned, increasing generation and reducing demand during peak hours, when gas-fired plants are typically tapped to meet load. In addition, because community solar resources are monitored and maintained by the utility, energy production is more likely to remain stable and not be subject to performance degradation over time, as compared to rooftop solar systems. From a community development perspective, the community solar option removes potential physical constraints for building developers that may have otherwise been restricted to locate homes in place that have optimal solar panel positioning. To that end, the tree canopy concept that SMUD describes in the Application can eventually improve shading and reduce energy use, especially during critical peak energy consumption hours.

In NCPA's opinion, SMUD's program is designed to exceed the requirements of section 10-115(a) and will provide additional, affordable, and durable solar power to new homeowners in SMUD's service territory. More broadly, such a project allows every community member living in the SMUD service territory an opportunity to help the state move closer towards reaching its carbon-free goals. If approved by the Commission, it will serve as a model that utilities across the state can apply in their respective communities. We encourage the Commission to approve SMUD's application on February 20.

Respectfully submitted,



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² Under the NCPA solar program, NCPA members are considering the deployment of several projects which will add as much as 40 megawatts of solar to the NCPA member resource mix. Community solar is one option being considered for some of these projects.