

DOCKETED

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Comment Received From: Amber Blixt
Submitted On: 1/30/2020
Docket Number: 19-BSTD-08

Roseville Electric Utility's Letter in Support of SMUD's Revised SolarShares Application

Attached please find Roseville Electric Utility's letter in support of SMUD's Revised Solar Shares Application. Thank you.

Additional submitted attachment is included below.



Roseville Electric
2090 Hilltop Circle
Roseville, California 95747

January 30, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 98514-5512

RE: SUPPORT – SMUD’s Application to Administer a Community Shared Solar Program (Docket No. 19-BSTD-08)

Dear Commissioners,

Roseville Electric Utility supports the Sacramento Municipal Utility District’s (SMUD) Revised Application to administer the Neighborhood SolarShares Program as an alternative approach for complying with the onsite photovoltaic system requirements of the 2019 Building Energy Efficiency Standards. While not required by regulation, SMUD has made significant modifications to their revised application to address many of the concerns that were raised by stakeholders in response to their previous application.

The 2019 Building Energy Efficiency Requirements allow for an alternative compliance approach to the rooftop solar requirement for new homes, so long as the program administrator has demonstrated to the satisfaction of the California Energy Commission (CEC) that certain requirements are met. SMUD has sufficiently demonstrated that these requirements will be met and consequently CEC staff is recommending approval of SMUD’s application.

Roseville Electric Utility supports the approval of SMUD’s application because the proposal ensures that new homes will be served with renewable energy while providing flexibility for how that renewable energy may be supplied. SMUD’s proposal offers the advantage of a utility scale facility versus a homeowner managed system, which can provide economies of scale to reduce costs and lead to more clean energy benefits in the long run. Importantly, protections against double counting ensure the integrity of the program by requiring that the Renewable Energy Credits (RECs) generated by this program are retired and not applied to any other programs like the Renewable Portfolio Standard (RPS).

Roseville Electric Utility supports policies that maintain the ability to comply with regulations flexibly, in the way that best reflects community priorities. Accordingly, we support approval of SMUD’s revised application at the February 20, 2020 business meeting.

Sincerely,

A handwritten signature in black ink that reads "Amber Blixt".

Amber Blixt
Government Relations Supervisor
Roseville Electric Utility
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aablixt@roseville.ca.us