

DOCKETED

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SMUD SolarShares Support Letter from MID

Additional submitted attachment is included below.

January 31, 2020

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,

MID appreciates the opportunity to provide comments in this process and would like to submit the following comments for your consideration.

The Modesto Irrigation District (MID) writes to express our strong support for the Sacramento Municipal Utility District's (SMUD's) Neighborhood SolarShares program. We urge the Energy Commission to approve SMUD's application at its February Business Meeting.

Similarly to SMUD, MID is a community-owned public utility. We are located in California's San Joaquin Central Valley and governed by a 5-member local and publicly elected Board of Directors. MID provides electric service within an original 160 square mile service area and within an additional 400 square mile competitive zone area in Southern San Joaquin County. MID serves over 128,000 retail energy customers with approximately 2,500 GWh in annual retail energy sales.

MID is committed to providing clean, renewable power in a safe, environmentally responsible, reliable, and cost-effective manner. As the State moves forward with implementing its clean energy objectives, MID is dedicated to achieving our green energy goals while ensuring costs are borne equitably among our ratepayers. We support 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.

Community solar is not only affordable; it also offers significant environmental benefits. 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 performance is more likely to remain stable and high-performing over time. Tree canopies which naturally improve shading and reduce energy use will also have better opportunities to develop over new home communities, further reducing demand during peak hours.

SMUD's program is designed to meet or 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. We are encouraged to see that CEC Staff has, for the second time, recommended approval of SMUD's application. As other supporters have noted, the community solar option was a thoughtful and critical addition to the 2019 Building Standards, and through this letter, MID encourages the Energy Commission to approve SMUD's application on February 20. Thank you for the opportunity to provide these comments and for your consideration. If you should have any questions, please feel free to contact me at (209) 526-7490.

Respectfully submitted,
Modesto Irrigation District



Martin Caballero
Manager, MID Resource Planning and Development

Cc: James McFall, MID Assistant General Manager, Electric Resources
Dave Olivares, MID Electric Resources Engineer