

**DOCKETED**

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*Comment Received From: David Wright  
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## **A Better New Residence Solar Exemption Model**

Dear Commissioners, and CEC staff,

SMUD's application lacks several of the characteristics a worthy application for this exemption must or should have.

It does not meet the rule's standard of comparable or equivalent benefits for the resident(s). I have rooftop solar and I calculate my SMUD electrical savings conservatively at an average of \$40 a month, or \$480 annually. Other commenters have said \$35/month is a representative rooftop solar benefit. In contrast, SMUD's proposal promises residents a "community solar" benefit of 85 cents per month, or \$10 per year. This does not meet an acceptable standard of comparable benefit.

SMUD's proposal would be extremely damaging as a precedent to the rule. Developers would be able to avoid the cost, time, and effort of installing solar on new residences, at trivial cost. What developer is not going to want this? This would dramatically subvert the purpose and spirit of the initiative to put solar on all new residences.

Another element of the application that violates the spirit of the rule and sets terrible precedent is the proposal that residents, even homeowners, would not be able exit the program to install their own rooftop solar for 20 years. What an unbelievable infringement on personal right of action, inequitably imposed on low-income buyers - not to mention a barrier to true community growth of solar energy for a clean energy future.

This clarifies two principles that a better new-home solar exemption should be modeled on:

1. To enter SMUD's Community Solar Shares program, the developer should pay an amount comparable to the cost of installing solar, in order to remove developer incentives to avoid installing new residential solar. To keep this cost from being passed back onto low-income residents, the payment should be directed back to new residents, either as an upfront rebate or combined with lower electricity payments. As applicant and administrator of the exemption program it would make sense for SMUD to receive the developer fee and disburse the discounts/rebates.
2. New residents' entry into the program should be optional, and they should be able to exit it at will.

A disclaimer: while I am active in 350Sacramento.org, this comment does not represent any official position of 350Sacramento.

Thank you for denying the SMUD application as formulated, and applying the principles I have given above to any future T24 exemption proposals.