DOCKETED	
Docket Number:	19-BSTD-08
Project Title:	Community Shared System Applications
TN #:	231962
Document Title:	REU Comments - Support for Approval of SMUD's Neighborhood
	SolarShares Program
Description:	N/A
Filer:	System
Organization:	Redding Electric Utility/REU
Submitter Role:	Public Agency
Submission Date:	2/6/2020 2:47:52 PM
Docketed Date:	2/6/2020

Comment Received From: REU

Submitted On: 2/6/2020

Docket Number: 19-BSTD-08

Support for Approval of SMUD's Neighborhood SolarShares Program

Additional submitted attachment is included below.

January 27, 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,

Redding Electric Utility (REU) writes to express our strong support for the Sacramento Municipal Utility District's (SMUD) Neighborhood SolarShares program. We urge the Commission to approve SMUD's application at its February Business Meeting.

Like SMUD, REU is community-owned. Serving as the City of Redding's public electric utility, REU's 44,200 customers include over 37,200 residential and 6,970 commercial accounts. As reported in 2018 U.S. Census data, Redding is a low-income community of a population of about 92,000 with almost 19% of its citizens over the age of 65. Redding's median household income in 2017 dollars was just over \$46,000 with 18.9% of the population in poverty.

Also, like SMUD, we are committed to providing clean, renewable power in a safe, environmentally responsible, and cost-effective manner. As publicly-owned electric utilities, we are each dedicated to achieving our green energy goals while ensuring costs are borne equitably among our ratepayers. 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. Serving a low-income community, we are keenly aware of how important this approach is to ensure affordability to rate payers.

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, too, which naturally improve shading and reduce energy use, will have better opportunities to develop over new home communities, further reducing demand during peak hours.

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. 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, we encourage the Commission to approve SMUD's application on February 20.

Respectfully submitted.

Dan Beans

Electric Utility Director