

**DOCKETED**

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*Comment Received From: Richard Skaff*  
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*Docket Number: 19-BSTD-08*

## **Comments on SMUD's SolarShares Proposal**

Please Reject SMUD's Current SolarShares Proposal and Initiate an Emergency Rulemaking Process to Protect Vulnerable Seniors and People with Disabilities.

*Additional submitted attachment is included below.*

**From:** Richard Skaff  
**Sent:** Wednesday, February 5, 2020 3:09 PM  
**To:** Gallardo, Noemi@Energy <[noemi.gallardo@energy.ca.gov](mailto:noemi.gallardo@energy.ca.gov)>  
**Subject:** Letter to the California Energy Commission

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February 7, 2020  
California Energy Commission  
1516 9th Street  
Sacramento, CA 95814  
Docket number: 19-BSTD-08

**Subject:** Please Reject SMUD's Current SolarShares Proposal and Initiate an Emergency Rulemaking Process to Protect Vulnerable Seniors and People with Disabilities

Dear Commissioners,

I, Richard Skaff, Executive Director of Designing Accessible Communities, a 501C3 non-profit that advocates for the rights of people with disabilities, requests that the Energy Commission reject SMUD's current SolarShares proposal and initiate an emergency rulemaking session to ensure that California's vulnerable populations have access to energy storage paired with solar.

The recent power shutoffs and wildfires show the urgent need for these clean, safe solutions. When the grid goes down, **energy storage paired with solar** can (1) give power to life-saving medical equipment, (2) regulate the indoor temperature for seniors and residents with disabilities, and (3) electronically open garage doors to allow seniors and people with disabilities to leave their homes or escape fires who do not have the ability or strength to manually open garage doors.

I commend the Energy Commission on using the 2019 building standards to encourage homes to install storage. The standards incentivize energy storage by allowing builders to receive compliance credit by installing batteries. Additionally, because of the new home solar mandate, owners of new homes that want to have solar paired storage only need to add storage.

Unfortunately, SMUD's SolarShares program would result in fewer homes adding storage during construction, and fewer people being able to add storage at a later date. Few, if any new homes will be built with storage because homes enrolled in SolarShares are not eligible to receive compliance credit for batteries. Also, **batteries that are not paired with solar (stand-alone batteries) make less sense to install because they cannot recharge during an outage.**

Further, and most importantly, SolarShares effectively blocks residents from going solar for twenty years, preventing residents from adding solar paired storage as well.

I do not make this statement lightly: in light of the recent power shutoffs, blocking homes from going solar with storage for twenty years, and building fewer homes with these clean technologies, will kill people. To prevent the loss of life, I request the Energy Commission initiate an emergency rulemaking to alter the building standards to ensure that community solar programs that meet the requirements of the new home solar mandate do not result in the lower adoption of residential storage. In the meantime, the Commission should reject SMUD's SolarShares program because it will discourage and prevent homes from adding storage.

Under Gov Code 11342.545 an "emergency" means a situation that calls for immediate action to avoid serious harm to the public peace, health, safety, or general welfare. The recent wildfires and power shutoffs clearly constitute an emergency, which did not exist when community solar was adopted in 2018 as a compliance method to meet the new home solar mandate. As such, the Energy Commission should respond to this emergency with an emergency rulemaking.

Thank you.

Sincerely,

Richard Skaff, Executive Director  
Designing Accessible Communities