

DOCKETED

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Opposition to SMUD Solar Shares Proposal

Additional submitted attachment is included below.



California Energy Commission
Dockets Office, MS-4
Re: Docket No. 19-BSTD-08
1516 Ninth Street
Sacramento, CA 95814

January 30, 2020

Dear Commissioners,

On behalf of the undersigned organizations, we want to express serious concern with the Sacramento Municipal Utilities District's (SMUD) revised SolarShares proposal. We urge you to reject the proposal. If approved, the policy would endanger California's landmark Title 24 standard requiring solar on new home construction, and undermine California's efforts to dramatically decrease climate pollution.

California leaders spearheaded some of the most ambitious climate policies in the nation, but analysis shows we are falling behind in achieving them. The new homes solar mandate, much like California's commitment to 100% carbon-free energy, set a national precedent. We made the commitment. Now it is time to deliver.

In November, the CEC postponed a vote on SMUD's SolarShares proposal, citing concerns that it would undermine the intention behind the new homes solar mandate and block the installation of solar and storage. While SMUD made positive adjustments to their current proposal, it maintains unacceptable barriers to solar access and threatens to undermine the new building standards throughout the state.

Under SMUD's proposal:

- The SolarShares program would make it harder for California to meet its clean energy goals. Currently, rooftop solar does not directly count toward Renewable Portfolio Standard obligations so all Title 24 development would be in addition to SMUD's required solar development. If rooftop solar is used to comply with Title 24 standards solar, more renewable energy will be built.
- Single-family and multi-family homes enrolled in SolarShares would be effectively blocked from going solar for 20 years.



- The SolarShares program removes incentives that encourage homebuilders to install batteries for clean energy storage and backup power.
- Slashes the savings residents receive from solar
- SolarShares program takes a monopolistic approach to community solar, rather than allowing for developers and third-parties to offer competitive community solar options.
- SMUD customers will lose the ability to take advantage of the built environment to support solar growth in favor of large-scale, offsite systems that require developing more land and can be damaging to our local ecosystem.

The purpose of the CEC's new building standards is to build zero-carbon homes. The new standards wisely call for on-site solar, because it lowers electricity costs for residents as they transition to fully electrified homes and cars. SMUD's SolarShares program erodes our progress toward these goals and our undermines broader climate ambition.

With battery storage, local solar can also deliver clean, resilient backup power for the millions of Californians already facing significant threats from climate change. The increasing risk of power outages in California necessitates that we invest, not only clean energy, but in resilient energy at the local level. SMUD's SolarShares program would lower the total amount of clean energy built and block individuals from investing in clean resilient solutions in their communities.

We urge you to reject SMUD's SolarShares program.

Sincerely,

Liz Harmer

Claudine Custodio

Kris Lovekin

& the rest of the team at 350 Riverside

<https://world.350.org/riverside/>

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