

**DOCKETED**

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*Comment Received From: Steve Uhler*  
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## **BSTD-19-08 Reply to Senator Pan**

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Dear Senator Dr. Pan,

I see that you support SMUD's application for Neighborhood SolarShares as shown in Energy Commission Docket 19-BSTD-08.

See <https://efiling.energy.ca.gov/GetDocument.aspx?tn=231990>

I believe if you look again, you will find there is not enough data in SMUD's application to support your position that SMUD's option is the best or most economical way to receive renewable generation.

See <https://efiling.energy.ca.gov/GetDocument.aspx?tn=231588>

Title 24, 10-115 requires no energy bill payments for community solar, or payments that reduce the bills below what the customer would otherwise pay.

Please pay attention to the tax amounts on the bills, it appears that SMUD has overlooked crediting the customer for taxes payed related the SolarShares.

City of Sacramento tax (\$15.16) is the same on both bills, yet each bill has different totals. This tax calculation is not explained in the application and appears to be not compliant to City of Sacramento tax code, and Title 24, 10-115 requirement of no energy bill payments for community solar.

Solar generation that is installed onsite is tax exempt until at least 1/1/2025 pursuant to RTC Section 73. After 12/31/2024 it may be assessed at property tax rates, if the exemption is not extended.

Please also view this SMUD video clip on how SMUD sets rates for SolarShares and think about how this effects all SMUD customers.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=229857>

Perhaps you should check the math on the "mock" bills and reconsider your support.

If you placed an order with the ICU, and similar procedure and math errors occurred, you may harm or kill your patient.

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