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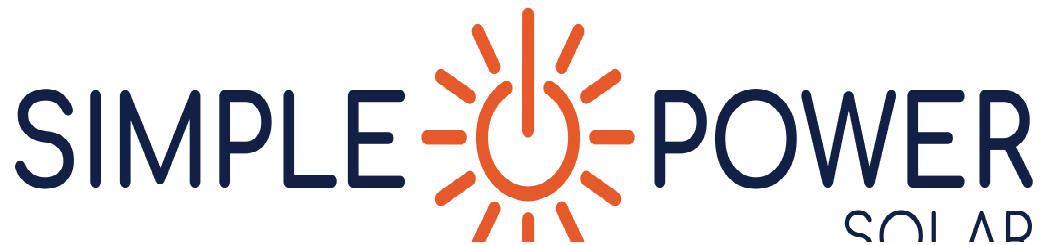
Docket Number:	19-BSTD-12
Project Title:	Town of Truckee Petition to Solar PV Requirement
TN #:	234845
Document Title:	Mark Dickson Comments - Comment from Simple Power Solar
Description:	N/A
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Organization:	Mark Dickson
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Comment Received From: Mark Dickson
Submitted On: 9/21/2020
Docket Number: 19-BSTD-12

Comment from Simple Power Solar

Please see attached

Additional submitted attachment is included below.



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RE: Docket No. 19-BSTD-12 Comments

My name is Mark Dickson, owner of Simple Power Solar that a local solar EPC servicing the Truckee, Tahoe Basin, and Reno areas for 7 years. Our firm has extensive experience installing solar systems in snow country including a wide diversity of weather conditions, roof orientations/pitches and snow load conditions. Based on our experience in the field and past project performance, solar can and should be installed in snow country with very few exceptions. Hopefully, the extreme wildfires and weather can serve as a reminder of the continued need to make the transition to an alternative energy carbon-free future.

We believe the initial petition for the proposed exemption for solar in snow load areas is overly prescriptive and will undermine a significant amount of homes that can have solar safely and efficiently installed. We know this because we have installed systems in areas that would be exempted by this petition that have high functioning PV systems that have stood the test of time through the extreme weather events that the Truckee and Tahoe areas have experienced over the last decade. By allowing exemptions for the progressive CPUC solar requirement, the result will be that engineers and designers will be able to take the easy way out and not plan for and design a suitable, well thought out location for the home's PV system. Just like the building department would not request an exemption for egress requirements in the home for residents to safely evacuate during a fire, regulation drives design. If homes are required to have solar, designers and engineers will design for that system.

We generally agree with the CPUC staff analysis and conclusions in their response as part of Docket No. 19-BSTD-12. It is important to note that the initial petition ignored the slippery surface properties of solar. Solar panels are made from aluminum and glass and anyone that has lived or worked in snow country understands how the different roof material properties affect snow shedding. We have included a picture we took of a solar system we installed in Truckee to illustrate this point. In the picture you can see a solar PV system installed on a composition roof. As you will see the snow completely sheds off of the PV system, but it remains on the composition portions of the roof on either side of the array. This is similar to the properties of metal roofs you see on many homes in our area. CPUC Staff acknowledged that the slippery surface properties of solar was missing from the calculations used in the initial petition and we support their inclusion in Staff's response.

We also want to highlight Staff's important second and third conclusions included below:
"2) Choosing roof slopes and PV panel locations that maximize the roof slope and allow the PV system to qualify as unobstructed slippery surfaces.

3) Modifying roof designs, roof locations, or PV panel mounting to avoid issues, such as unnecessary snow accumulation or snow sliding off the roof to undesirable locations on the site.”

Both of the above conclusions drive to the heart of the point we would like to highlight: Designers and engineers need to use prudent design to plan for solar because solar works in snow country. If it is required to plan for solar then the regulation will be successful in driving us towards meeting the very important and ambitious California renewable energy goals. We would like to thank the CPUC Staff and commission for their diligence and care in their thoughtful petition response.



10024 Suffolk Place, Truckee, CA

Sincerely,

Handwritten signature of Mark Dickson in blue ink.

Mark Dickson, President
Simple Power, Inc.