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| <b>DOCKET</b> |             |
| 07-SB-1       |             |
| <b>DATE</b>   | AUG 28 2007 |
| <b>RECD.</b>  | AUG 28 2007 |

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|--|---|------------------------------|
| In the Matter of:                      | ) | Energy Commission            |
|  | ) | Docket No. 07-SB-1           |
| Senate Bill 1 Eligibility              | ) |                              |
| Criteria and Conditions for Incentives | ) | SB1 Eligibility Criteria and |
| <hr/>                                  | ) | Conditions for Incentives    |

Comments of  
The  
California Municipal Utilities Association

SB 1 gives the Energy Commission the authority to determine the "Appropriate energy efficiency improvements in the new or existing home or commercial structure where the solar energy system is installed."

CMUA members are concerned that tying SB 1 eligibility criteria that are either cumbersome or viewed by consumers to be costly could result in less success of their solar rebate programs and urge the Commission to consider that balance in exercising your considerable discretion under the above section of SB 1. While you clearly could require a large variety of energy efficiency measures there is no minimum requirement contained in the above language of SB 1.

During the staff presentation and in the staff report there was a preference for requiring either 15% or 30% above Title 24 requirements in order for new buildings to qualify for the solar rebate. That appears to be a potentially cumbersome and demand dampening requirement.

The staff report also provides a proposal to tie Public Goods Charge money to the solar installations. SB 1 provides that in the case of publicly owned utilities "In establishing the program required by this section, no moneys shall be diverted from any existing programs for low-income ratepayers, or from cost-effective energy efficiency or demand response programs." We are concerned that the staff proposal could violate the provisions of SB 1.

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All utilities in California are required by SB 1037 and AB 2021 to install all cost effective and feasible energy efficiency measures. The language in SB 1, "Appropriate energy efficiency improvements in the new or existing home or commercial structure where the solar energy system is installed" clearly refers to eligibility criteria that apply to the customer not the utility. We urge the Commission minimize the cost and difficulty of any energy efficiency criteria it may place on consumers as a condition of receiving the solar rebate under SB 1.



Gerald L. Jordan  
Executive Director  
California Municipal Utilities Association  
915 L Street Suite 1460  
Sacramento CA 95814  
916-326-5800  
Fax 916-326-5810  
Jordan@cmua.org