

**Re: Guidelines for California's Solar Electric Incentive Programs
Pursuant to Senate Bill 1**

submitted to
California Energy Commission

by
Clean Power Cooperative of Nevada County

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October 4, 2007

The CPCNC appreciates this opportunity to comment on the draft staff report, **Guidelines for California's Solar Electric Incentive Programs Pursuant to Senate Bill 1**

The CPCNC is committed to promoting and facilitating energy conservation, energy efficiency and the production of clean sustainable energy in Nevada County. To that end we want to see more households. investing in solar PV systems. Unfortunately many of the members of our community will not be allowed to participate in the CSI program unless the following restriction is removed:

"The solar system must be located on the same premises where the consumer's own electricity demand is located."

This regulation, in effect, excludes the following from participating in the CSI program:

- Renters (residences and businesses)
- Residences and businesses who do not get enough solar exposure.
- Historical buildings
- Residences and businesses in historical zones
- Those living under some form of restrictive covenant

Therefore, the program as drafted is inherently discriminatory.

Only those who own a building or property that has good solar exposure need apply.

Fortunately, this situation can be rectified if the energy consumer is allowed to install his or her array on a separate property with proper solar exposure and access to the grid. A second meter would be required

The consumer would put up his array on land made available by some one else.

The property owner, where the solar array is located, might be compensated by getting a **clean energy tax credit** based on the number of kWh generated for the tax year, or maybe receive a modest rent for the space.

The land could be anywhere within the service area of the primary energy provider, preferably in the same community.

Anyone doing one of these installations would be eligible for a rebate just as if they had installed the array on their building or property.

If we can break the physical link between the user and the energy generator, this will democratize the rebate program.

Everyone contributes to the funding of the CSI program. Shouldn't everyone be eligible to participate?

We would be pleased to assist the Commission in any way to help make the CSI program available to all California citizens.

Respectfully submitted,

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