

Energy and Green Building Programs  
 Environmental Programs Division  
 1212 5th Street, 1st Floor  
 Santa Monica, California 90401

03-RPS-1078  
**DOCKET**  
 08-IEP-1  
 DATE \_\_\_\_\_  
 RECD. JUL 0 8 2008

California Energy Commission  
 Dockets Office, MS-4  
 Re: Docket No. 08-IEP-1 and No. 03-RPS-1078  
 1516 Ninth Street  
 Sacramento, CA 95814-5512

**DOCKET**  
 03-RPS-1078  
 DATE Oct. 08 2008  
 RECD. Oct. 08 2008

RE: No. 08-IEP-1 and No. 03-RPS-1078 and  
 2009 IEPR -- Feed-in Tariffs

Dear Madam/Sir:

First and foremost, the City of Santa Monica supports the establishment of a feed-in tariff for all distributed generation projects, not just for solar installations over 20 kW. A simple, transparent program with attractive incentives will quickly accelerate the installation of systems throughout California and transform the solar industry into the vital economic engine it has become in Germany, Spain, and increasingly in other European countries.

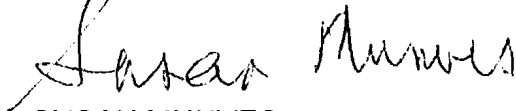
Solar Santa Monica is the City of Santa Monica's initiative to install 100 MW of solar photovoltaic systems on all feasible rooftops by 2020. The City's goal is to achieve a "net zero energy community"-- a city that generates all the energy it consumes by maximizing energy efficiency, solar, and clean distributed generation throughout the building infrastructure. Achieving a net zero energy community is impossible, however, under current net metering regulations. Adoption of a well-designed feed-in tariff is essential if Santa Monica and other communities are to achieve their mandatory AB 32 emission reduction goals.

Solar Santa Monica needs a means to enable solar systems for multi-metered buildings. With over 30,000 apartments in town, versus 8,000 single family homes, the CEC's leadership in promoting a feed-in tariff would open up new solar markets heretofore boxed out of the market. Just as apartments are submetered, limiting the value of a buildings' rooftop to offsetting the common area load, so are most commercial buildings. A feed-in tariff would completely remove this barrier to their participation.

Solar Santa Monica is planning to aggregate citizens and businesses to build community power systems. The current net energy metering rules forbid this; an attractive feed-in tariff at retail rates will enable this. In this way, Solar Santa Monica can provide tenants and businesses who cannot install solar on their rooftops with a means to participate in the achievement of an energy independent community.

Thank you for your consideration of the City of Santa Monica's comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Munves". The signature is written in a cursive style with a large initial "S".

SUSAN MUNVES  
Energy and Green Building Administrator