



Sept 13, 2023

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear CPUC Commissioners and staff,

We are a group of commercial real estate companies, including the premier commercial real estate trade association in Los Angeles and Orange Counties. Collectively, we own over 250 million square feet of commercial and industrial roof space across California. We are eager to be leaders in supporting the deployment of renewable energy in urban areas, as a means of giving back to our communities and meeting our sustainability goals. Community solar + battery storage will allow us to utilize our abundant roof space to make the grid more reliable, reduce pollution and generate utility bill savings for low-income households and other members of our communities. However, none of California's limited existing community solar programs have worked to unlock the potential of the Golden State's commercial/industrial roofs for community renewable energy, because the economics of those programs are unworkable.

We have learned that the California Public Utilities Commission (CPUC) is considering approving a new statewide community solar + battery storage (CS+S) program that will have a strong low-income focus. This program, called the Net Value Billing Tariff, has been proposed by the Coalition for Community Solar Access (CCSA) and enjoys support from a broad range of stakeholders in your proceeding, from consumer advocacy organizations to environmental justice groups to the residential construction industry. We understand that this program is consistent with AB 2316, the law passed by the Legislature in 2022, but that the state's large investor-owned utilities are opposing the proposed community solar program in CPUC Proceeding A.22-05-022. We hope that the Commission will not be deterred from taking bold action to facilitate community solar.

We join CCSA and many other stakeholders in urging you, first and most importantly, to approve the Net Value Billing Tariff program quickly. This new program will create the policy structure that unlocks the deployment of potentially thousands of megawatts of community solar and storage across California, including on large commercial roofs like ours, during a time when our state desperately needs new emissions-free power generation capacity to avoid blackouts and to reduce pollution from fossil fuel-fired power plants. Additionally, each of these projects must dedicate at least 51% of its capacity to serving low-income families, so the energy equity benefits of this program will also be substantial.

Second, additional sources of funding may be needed to ensure that commercial/industrial rooftop CS+S projects of many sizes can get built in California when your new program is approved. As described in Solar Landscape's July 31, 2023 comments in A.22-05-022,¹ commercial/industrial rooftop community solar projects located in urban areas, many of which

¹ See <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M515/K626/515626301.PDF>

are also located in Disadvantaged Communities, bring substantial value to the grid, and should be compensated for that value because they are more expensive to develop than ground mounted community solar projects. It would be a missed opportunity if your agency approved a major new community solar program that does not give commercial building owners the ability to put our large empty roofs to use for community renewable energy. Please urge Governor Newsom to support commercial/industrial rooftop community solar incentives in the state budget, and also urge Governor Newsom's administration to file a strong state application by October 12 to win community solar funding from the \$7 billion available nationwide from the US Environmental Protection Agency via the 'Solar for All' program.

Sincerely,

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