



East Bay Housing Organizations



BERKELEY RENT BOARD





YCATS



San Joaquin Valley



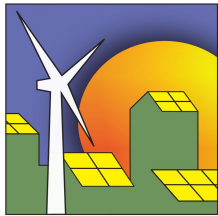
Democratic Club



Berkeley Electrification Working Group



Wellstone Democratic Renewal Club



LOCAL
CLEAN
ENERGY
ALLIANCE



UNITED NATIONS ASSOCIATION
OF THE UNITED STATES OF AMERICA
East Bay Chapter

Santa Cruz for
Bernie



California Alliance
for Community Energy
www.cacommunityenergy.org

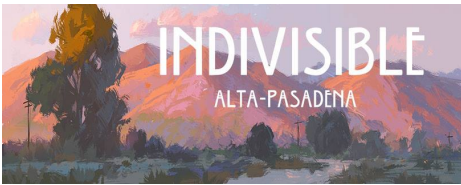


+350 Conejo
San Fernando Valley

Indivisible
California
**GREEN
TEAM**

INDIVISIBLE★
MARIN

INDIVISIBLE
SAN JOSE



INDIVISIBLE
VENTURA



INDIVISIBLE
Sacramento


Habitable Designs



+350 ContraCosta
Action

INDIVISIBLE
SAN PEDRO



Clean 
Coalition



LONG
BEACH
 350

 EAST VALLEY
INDIVISIBLES
San Fernando Valley, California



INDIVISIBLE
WESTSIDE ★ LA

the
climate
center




INDIVISIBLE

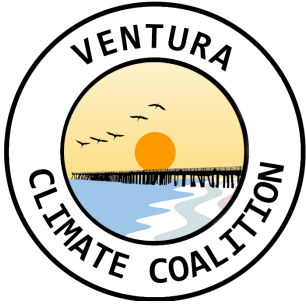


Coastal Lands
CLAN
Action Network



CALIFORNIANS
FOR
WESTERN
WILDERNESS





Climate 911





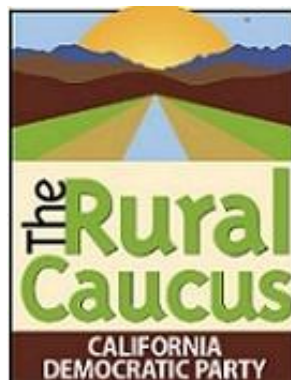
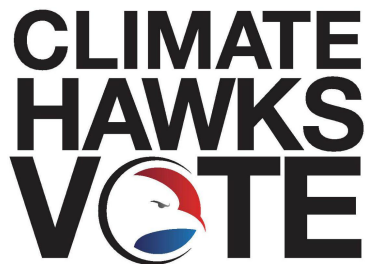
**SILICON VALLEY
YOUTH CLIMATE ACTION**

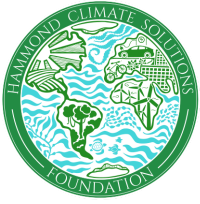


**SOLAR RIGHTS
ALLIANCE**



VOTE SOLAR

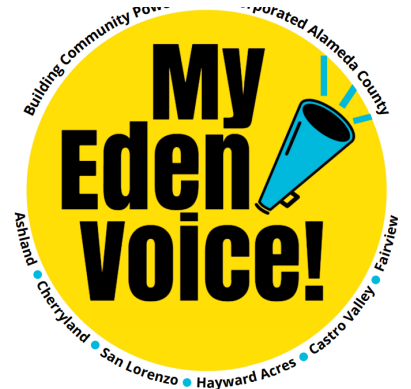




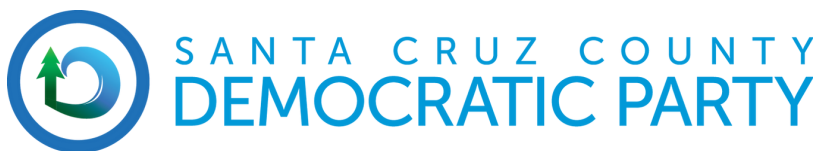
HAMMOND CLIMATE SOLUTIONS FOUNDATION
Dynamic Action for a Sustainable Planet



The Climate Reality Project
SILICON VALLEY CHAPTER



LONG BEACH ALLIANCE FOR CLEAN ENERGY



CPUC Docket R.20-08-020 (Virtual Net Energy Metering)

To: California Public Utilities Commission
cc: Governor Gavin Newsom

RE: Protect access to benefits of rooftop solar and batteries for California renters

We, the undersigned organizations and community leaders, many of which represent working class and frontline communities that have suffered too long from air pollution, climate change, skyrocketing utility bills and blackouts - are writing to urge you to strengthen - not weaken - the state's program to bring rooftop solar and storage to California's 16 million renters. We are writing in strong opposition to the proposals from the utilities and the CPUC Public Advocate's Office that would eviscerate the state's Virtual Net Energy Metering (VNEM) program that serves multifamily renters, small businesses, and public agencies.

These proposals would deny tenants in multifamily housing the ability to buy less power from the utilities when they consume power directly from on-site solar. It would force renters to buy all of their power from the utility even when it is generated on their own rooftop. The CPUC is considering these proposals right after issuing its net billing tariff decision that allows customers in single-family housing to buy less power from the utilities when they generate their own power in real time. It would discriminate against renters by not giving them the same fair treatment as single-family homeowners.

Rooftop solar and batteries are a critical tool to help multifamily renters control unsustainable utility bills. Despite utility-driven and other bureaucratic obstacles, more than 37,000 renting families are benefiting from solar energy located on-site at multifamily developments across California. An additional 100,000 renters will benefit from new solar projects currently under development, and another 200,000 families in affordable multifamily developments are projected to get solar by 2030.

California should accelerate these adoption rates into the millions with well-established policy fixes that have been brought before lawmakers and regulators by frontline community advocates on numerous occasions.

It is critical to speed up the growth of rooftop solar and batteries on multifamily developments for a number of reasons:

- It's one of the best ways to give California renters immediate utility bill relief. California utility customers currently pay more for electricity than the rest of the nation, with very few options to lower those electricity costs.
- It's the best way to protect renters from blackouts, and the clean way to do so.
- It can be deployed quickly, especially if the remaining bureaucratic hurdles are removed;
- It is critical to the state tripling its solar capacity, as called for by the Energy Commission to meet the state's clean energy goals;
- It helps reduce the cost of the electrical grid, benefiting all ratepayers.

The state's VNEM program is the foundation for bringing rooftop solar to renters. VNEM lets owners of multifamily developments install solar panels onsite and use the solar energy produced to reduce renters' utility bills. It is one of the best tools available to reduce renters' utility bills because it directly reduces the renters' need to buy more expensive electricity from the utility. And, when paired with onsite batteries, VNEM is the best way to protect renters from blackouts.

The utilities are proposing to gut the state's VNEM program. Their proposal puts solar back out of reach for people living in apartment buildings, just as they were starting to get meaningful access to local, clean, affordable energy through VNEM. This would be unacceptable under any circumstance, and unfathomable that it would happen to some of the state's most vulnerable residents.

The utilities' proposal is a slap in the face to renters in two ways:

- It would force tenants to buy all of their energy from the utilities at full rates, even if some of it is being generated on their own rooftop.
- It would force multifamily properties to sell all of their solar generation to the utilities at rates that are a fraction of full utility rates, even if some of that energy is being used by tenants in real time.

The proposal from the CPUC Public Advocate's Office is even more concerning, calling for the elimination of the VNEM program altogether in favor of community solar – a worthwhile program that, once established in California, should be in addition to VNEM not in place of. While we support community solar when it is done correctly, we unambiguously reject the notion that it should be the only option available to renters. California should be offering renters more opportunities to benefit from customer-owned solar, not less.

Furthermore, we strongly disagree with the underlying justification provided for gutting the VNEM program. As the Center for Biological Diversity has shown in their recent report "[Rooftop Solar Justice](#)", the utilities' rationale is based on a manipulation of data that undercounts the true costs of large-scale utility infrastructure and significantly undervalues the real grid and societal benefits of rooftop solar and batteries. Substantial data and analysis have shown that accelerating rooftop solar adoption can in fact reduce the cost of the grid for all ratepayers and confer significant societal benefits.

Our organizations serve, and represent, actual working-class and middle-class renters. Decisions like these should be centered around the best interests of underserved renters and impacted communities, not the outdated and unsustainable business model of the utilities. The VNEM decision must allow generation consumed on-site in real time to reduce the amount of power that customers purchase from the utilities, along with other components that allow solar and storage to grow and continue to provide real savings to multifamily tenants across our Golden State.

Thank you,

Self-Help Enterprises

Association for Energy Affordability, Inc.

California Housing Partnership
CADEM Renters Council
MidPen Housing Corporation
CA Alliance For Retired Americans
Tenants Together
Resources for Community Development
Monterey County Renters United
California Environmental Justice Alliance (CEJA)
Asian Pacific Environmental Network
Center for Biological Diversity
Southern California Association of NonProfit Housing (SCANPH)
The Danco Group
Sierra Club
Environment California
Coalition for Environmental Equity and Economics
Alliance of Nurses for Healthy Environments
Bay Area Community Services
San Francisco Bay Physicians for Social Responsibility
Sunflower Alliance
Ecology Center
SPUR
Environmental Justice Coalition for Water
1000 Grandmothers for Future Generations
Council of Mexican Federations in North America (COFEM)
East Bay for Everyone
Greenbelt Alliance
East Bay Housing Organizations
Center on Race, Poverty & the Environment
Northern California Land Trust (NCLT)
Bay Area Community Land Trust
Berkeley Rent Stabilization Board
Oakland Tenants Union
Gallaher Community Housing
SanDiego350
350 Petaluma

350 Silicon Valley
350 Bay Area
350 Humboldt
350 Ventura County Climate Hub
Indivisible Ross Valley
Sunrise Bay Area
198 methods
North County Climate Change Alliance
Feminists in Action Los Angeles
Californians for Energy Choice
Long Beach Environmental Alliance
Youth Climate Action Team
Climate Action Mendocino
Equity Transit
Hollywood NOW
San Joaquin Valley Democratic Club
Good Neighbor Steering Committee of Benicia
Resource Renewal Institute
Center for Community Energy
Strike Debt Bay Area
Progressives for Democracy in America
Extinction Rebellion San Francisco Bay Area
Oil and Gas Action Network
Santa Cruz Climate Action Network
Berkeley Electrification Working Group
Alameda County Health Care Agency
Albany Climate Action Coalition
East Bay Clean Power Alliance
Local Clean Energy Alliance
ForOurChildren.Love
Hall Properties
Kehilla Community Synagogue
Wellstone Democratic Renewal Club
Progressive Alliance
United Nations Association, East Bay Chapter

Santa Cruz for Bernie
California Alliance for Community Energy
Progressive Democrats of the Santa Monica Mountains
So Cal 350
350 Conejo SFV
Indivisible CA Green Team
Indivisible Marin
Indivisible San Jose
Indivisible Alta Pasadena
Indivisible Ventura
Indivisible Stanislaus
Rooted in Resistance (Indivisible)
Indivisible Sacramento
Women's March Santa Barbara
Habitable Designs
California Climate Voters
Indivisible Resisters Walnut Creek
Indivisible San Pedro
Indivisible Santa Barbara
Indivisible Media City Burbank
350 Contra Costa Action
Ban SUP (Single Use Plastic)
Stand Strong LA Indivisible
Indivisible Santa Cruz
Progressive Democrats of America, California PDA-CA
Clean Coalition
Indivisible Sonoma County
Long Beach 350
East Valley Indivisibles
Valley Women's Club of San Lorenzo Valley
Indivisible Westside
The Climate Center
Indivisible Resistance Northridge
Indivisible South Bay LA
Californians for Community Energy

Indivisible Yolo
Ballona Wetlands Institute
Defend Ballona Wetlands
Coastal Lands Clan Action Network
San Francisco League of Conservation Voters
Climate Reality Project, Riverside County CA Chapter
Designing Accessible Communities
Change Begins With ME (Indivisible)
Grassroots Institute
Dr. John's Nutrition Health
Pink Panthers
Californians for Western Wilderness
Mountain Progressives
CBFD Indivisible
Courageous Resistance and Indivisible of the Desert
Venice Resistance
Glendale Environmental Coalition
Ventura Climate Coalition
The Climate Reality Project San Diego Chapter
Climate 911
California College Democrats Environmental Caucus
Long Beach Gray Panthers
International Longshore and Warehouse Union, NCLC
HOLA Olexo Architecture + Landscape
Sustainable Marin
CleanEarth4Kids.org
Reform & Sustain
Biodiversity First!
Community Advancement Development Corporation
FCAT- Fallbrook Climate Action Team
Livermore Indivisible
Stand.earth
GRID Alternatives
Interfaith Solidarity Network
Fresnans against Fracking

Unitarian Universalist Social Justice Team
Silicon Valley Youth Climate Action
Solar Rights Alliance
Humboldt Progressive Democrats
Vote Solar
Climate Hawks Vote
Third Act - Sacramento
Third Act SoCal Chapter
Third Act - SF Bay Area
CDP Rural Caucus
Great Old Broads for the Wilderness
Hammond Climate Solutions Foundation
Promotores de Salud de El Condado de Orange County
Climate Reality: Silicon Valley
Bay Area Clean Air Coalition
California Young Democrats
My Eden Voice
California Young Democrats Environmental Caucus
Our Revolution East Bay
Alameda County Democratic Party
San Joaquin County Democratic Party
Long Beach Alliance for Clean Energy
CADEM Party Environmental Caucus
Redwood Energy
Obviously Inspects East Bay
Santa Cruz Democratic Party
Integrated Community Development