

Frequently Asked Questions & Public Comments

This document is a compilation of frequently asked questions regarding the Strategic Energy Plan for the County of Santa Barbara and the cities of Carpinteria and Goleta. The goal of this document is to answer frequently asked questions and to refer to the location of the topic in the Strategic Energy Plan where the comment is addressed or incorporated, if applicable.

Date & Commenter	Public Comment	Response
<p>5-17-2019 Bob Perry</p>	<p>Goleta - Is there a breakdown available of residential and commercial solar? Why such a low amount for parking lots, which are general large open spaces on commercial industrial sites. How does solar capacity on commercial roofs compare to parking lots on such sites?</p>	<p><i>Please see Table 2.3 in Section 2.4 on page 19 for the breakdown between Residential, Commercial, and Large Commercial/Industrial opportunities for solar installation in Goleta. These data are also broken down between rooftop and parking lot capacities. Parking lots do indeed provide space, but typically only on commercial properties, which are vastly outnumbered by residential properties. At commercial properties that do have parking lots, the sampled lots show significant tree shading, which compares unfavorably with the relatively unshaded commercial rooftop areas that were sampled. With frequent shading concerns, the estimated capacity of parking lots was reduced by estimating a lower participation level. Should the preference be for cutting trees in parking lots over installing solar on relatively clear rooftops, the parking lot capacity could exceed the estimates in the SEP. The ratio of relatively unshaded commercial/industrial rooftops to relatively unshaded parking lots is approximately 4:1 in the sampled areas.</i></p> <p><i>Another reason for the lower participation rates ascribed to commercial parking lots is a higher cost to construct compared to rooftop solar (mostly due to steel costs) and geotechnical concerns relating to water tables and liquefaction zones (see response to comment on soils data below on page 3).</i></p>
<p>5-17-2019 Bob Perry</p>	<p>Goleta - What are the assumptions concerning site load and roof lease revenue and liability? Do these assumptions include energy storage? Have you</p>	<p><i>Please see Section 4.1.2 on page 28 for more information. Site load is a constraint as related to annual consumption being the highest allowable solar system output allowed through utility</i></p>

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	discussed with SCE the possibility of maximizing roof generation as part of an aggregate IFOM (in-front-of-meter) project using a feed-in tariff?	<i>net-metering rules (solar systems can generally not be sized to exceed 100% of annual energy consumption). Roof leasing challenges relate to financing and insurance constraints faced by property owners considering leasing out the use of their unused roof space for solar installations. Site load would generally not be a constraint for energy storage beyond the expected output of an attached solar system, if such a system exists. Leasing constraints would not necessarily apply to energy storage, unless battery installations on-site increased insurance liabilities. Our understanding is that SCE is not interested in a new feed-in tariff, but, rather, seeks to enable more large-scale off-site renewable energy through proposed Green Tariff programs.</i>
5-17-2019 Bob Perry	Goleta - Where are the interconnection difficulties in Western Goleta? Does it concern the commercial/industrial properties located along Hollister?	<i>Please see Figure 4.4 in Section 4.6.1 on page 36. Feeder capacities are fairly or significantly limited west and north of the Camino Real Marketplace. Commercial/industrial properties along Hollister Avenue east of Camino Real Marketplace generally face fewer feeder capacity issues, with some exceptions.</i>
5-17-2019 Bob Perry	Goleta - What percentage of energy procured through a CCA is locally generated?	<i>Please see Section 3.3 on page 26 for more information. The hypothetical CCA modeled in the SEP impact modeling has been assumed to start at 75% renewable electricity and increase to 100% (see 3.3, p. 27). The percentage of this renewable electricity that would be local has not been considered in the SEP and would depend upon CCA procurement programs and approach.</i>

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5-17-2019 Bob Perry	Goleta - Have any generation calculations been made from the 425 acres of commercial rooftops in Table 2.1? Is there corresponding capacity for parking lots on those sites?	<i>Yes, please see the estimated corresponding capacities and generation outputs in Tables 2.3 and 2.4 in Section 2.4 on pages 19 and 20. Commercial/industrial rooftops are estimated at 73-99 MW of solar capacity. Parking lots at the same facilities, after applying estimated participation factors, are estimated to contain 22-26 MW of solar capacity.</i>
5-17-2019 Bob Perry	Goleta - Has the total export capacity of feeders in commercial-industrial sectors been calculated? This would assume elimination of all site load, thereby freeing up export capacity to a substation. Also, is there any general geotechnical soils data available which might require additional structural requirements? Is the weight of such canopies a primary concern?	<i>Please see Section 4.6.1 on page 36. Total availability capacities of feeders throughout Goleta have been gathered from SCE Integration Capacity Analysis maps. Since the utilities own and operate the distribution network, the utilities can and do make a "worst-case" assumption of zero load (meaning full export) when determining allowable new capacity onto the grid, precluding the argument, from the utilities point of view, that behind-the-meter DERs can reduce strain on the distribution grid. The SEP did not have access to a general geotechnical soils analysis, but the SEP team has found that structural capacities for soils will vary greatly from site to site. Generally, sites seeking underground work of significant depth (i.e., carports with piers normally 8-12 feet below grade) encounter structural issues around water tables that are close to the surface or in areas where silt or other soft soils settle. Typically, horizontal shear, as a combination of weight and potential wind-loading forces, is the primary concern.</i>
5-17-2019 Bob Perry	Goleta - Why is parking lot capacity less than a quarter of rooftop capacity, particularly on standard commercial sites? My overview of commercial	<i>Many commercial properties do not feature off-street parking, or their off-street parking is constrained by proximity to buildings or neighboring buildings in a way that would make parking lot solar</i>

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	<p>industrial properties indicates that parking lots at least equal that of rooftops.</p>	<p><i>unfeasible. At commercial properties that do have parking lots, the sampled lots show significant tree shading, which compares unfavorably with the relatively unshaded commercial rooftop areas that were sampled. As discussed in the response to the comment on residential versus commercial solar break down (page 1), the estimated capacity of parking lots was reduced by estimating a lower participation level. Should the preference be for cutting trees in parking lots over installing solar on relatively clear rooftops, the parking lot capacity could exceed the estimates in the SEP. The ratio of relatively unshaded commercial/industrial rooftops to relatively unshaded parking lots is approximately 4:1 in the sampled areas.</i></p>
<p>5-17-2019 Bob Perry</p>	<p>Goleta - Is the following excerpt (my emphasis) an SCE requirement? “Since a storage system could discharge at its peak capacity at the same time as a solar panel also generating at its peak rate, the combined capacity of the two components is used to determine interconnection viability. As such, it competes for space on the distribution grid with solar power despite not resulting in additional annual generation.” Under what conditions would peak solar and storage discharge at the same time?</p>	<p><i>This statement has been clarified on page 21 of the Goleta SEP. The utilities treat solar + storage as though both the solar and battery storage systems could discharge at full capacity at the same time, even though this scenario is unlikely to ever occur, due to the way solar + storage systems are electrically wired and controlled through software. By treating solar + storage systems as though both could and would export at full capacity at the same time, the utilities restrict the size of solar + storage systems on their grids.</i></p>
<p>5-17-2019 Bob Perry</p>	<p>Goleta - What are the assumptions relative to the increase in EV load over time? Have any projections been made concerning the increase in electric fleet</p>	<p><i>The estimated EV load increase uses historic data from SLED (State and Local Energy Data) and SCE estimates for future electric vehicle penetration. EV penetrations have been aggregated and treated separately from specific charging</i></p>

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	vehicles charged on commercial sites with high solar capacity?	<i>locations, which have not been analyzed during forecasting the city's electricity demand. Stress on the grid caused by demand spikes from high EV charging loads at certain sites are a legitimate concern but were beyond the scope of this planning effort.</i>
5-17-2019 Bob Perry	Goleta - What portion of CCA Marginal Renewable Generation is local and what portion is delivered via fragile transmission lines?	<i>Local content of CCA renewable generation is assumed to likely be low, but no specific percentage has been estimated. As noted in Section 3.3 on page 27, renewable generation through a CCA would not necessarily resolve local resiliency issues, but specific CCA programs could potentially focus on spurring local generation.</i>
5-17-2019 Bob Perry	Goleta – Comment on Land Ownership, Structural, and Locational Barriers-Split Incentives: Such a green lease should serve to reward property owners through matching system generation against established grid tariffs, with a floor equal to any incurred PPA costs. EE costs should be allocated pro rata over the life of the asset, and disappear once fully paid. IFOM FITs are the simplest, but probably would result in the lowest ROI.	<i>This topic is covered in Section 4.1.1 on page 28, and Section 6.5.1 on page 78 of the SEP. Goleta's SEP identifies the split-incentive issue as an obstacle to solar development in commercial and multi-family residential buildings. Solutions identified include 1). facilitation of green leases that bridge the gap by having tenants and landlords share the benefits of energy projects, where the tenant pays a higher rent per square foot to account for lower utility bill costs due to actions taken and paid for by the landlord, (Strategy 6.5.1), and 2). Institution of feed-in tariffs through either a CCA or by lobbying SCE.</i> <i>Site lease (and FIT) structure will need to be carefully managed to ensure that there is equity in financial benefits between</i>

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		<i>tenants and property owners, but exact design of these policies is beyond the scope of this effort.</i>
5-17-2019 Bob Perry	Goleta - What are the structural damage risks related to rooftop solar? Could owners avoid these risks by just solarizing their parking lots? Could commercial owners be offered rooftop solar to cover site load, then contract to generate maximum parking capacity incorporating increased feeder load? Could the City issue an insurance plan by requiring developers to pay a premium on an aggregated basis to keep rates low?	<p><i>Property owners are concerned about rooftop leaks arising from penetrations made during solar installation. Property owners understand that roof and labor warranties would require repairs, but insurance may not cover damages to tenant property caused by roof leaks. Solar carports are a solution to avoid rooftop construction risks, but are not a viable option at all locations. While, physically and electrically, property owners could use larger feeder wires to both offset on-site load and export significant energy directly to the grid, the utility (or potential CCA) needs to offer an energy off-taker program (like Feed-In Tariff) to make this arrangement commercially viable.</i></p> <p><i>The idea of the City obtaining insurance against damages at select private properties, so as to limit the financial investment necessary, was considered in the SEP (4.1.2) and should be explored during implementation efforts. It was not suggested as a solution for immediate implementation because of the need for more research. .</i></p>
5-17-2019 Bob Perry	Goleta – Comment on Regional Collaboration: As the municipal and unincorporated areas of the Goleta 220/66 distribution system are all subject to the same issues, collaboration is critical in order to establish consistency in both process and function	<i>This item is addressed in each SEP under the “Obstacles and Opportunities” Chapter. While historically there has been a lack of formal collaboration, it has changed in recent years. It is understood that to carry the SEP work forward regional collaboration will be necessary.</i>

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	throughout the local service area. This will also serve to defray administrative and oversight costs.	
5-17-2019 Bob Perry	Goleta – Comment on Public Outreach: I agree that a “one-stop shop” online portal is a good idea, not only for education, resource and advisory services, but ultimately to provide a seamless step-by-step online process for permitting and approval of projects. Forms would be submitted, reviewed and approved online, with transparent pathway that shows all parties the exact status of a project. Issues in form submittal could be handled via online chat or message threads, with an option to discuss problem areas with staff.	<i>This topic is covered in Section 4.4 on pages 33-34 and Section 6.5.1 on page 79 of the Goleta SEP. Additional strategies to streamline permitting are also discussed in section 6.1.1 of the Goleta SEP.</i> <i>The City of Goleta is also already developing a Permit Tracking System that will facilitate day-to-day operations related to planning and building permits by enabling the City to track and report on all kinds of permit applications through the various planning and building processes. It will track permit records, plans, fees and associated data, with real time, web-based input-output and reporting capabilities. It will also be integrated with the concurrent, on-going Document Imaging Program, which will allow the system to catalogue and display historical permits issued both by the City and the County of Santa Barbara prior to City incorporation. The system is intended to enhance customer service, ensure data accountability, reduce permit processing time, decrease unnecessary staff workload, provide consolidated reporting and permit tracking across departments, and prevent compromised data security.</i>
5-17-2019 Bob Perry	Goleta – Comment on SCE Resiliency Procurement Process: For our area, SCE’s recent RFO was an unmitigated disaster. As I have repeatedly told SCE (and anyone else who will listen), the opaque,	<i>This topic is covered in section 4.5.1 on page 34 of the SEP. The SEP identifies the “Least-Cost Best-Fit” methodology used by SCE to rank projects in the Moorpark LCR/Goleta Resiliency Request for Proposals (LCR RFP), as an obstacle to renewable</i>

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	<p>competitively bid RFO/RFP process simply does not work with the countless number of distributed energy projects. What is needed is a continuous, transparent approval process, dictated by a general energy plan that establishes clear criteria and standards for project approval. Standardization would be encouraged to incentivize a quick, streamlined approval process.</p>	<p><i>generation. It states that this methodology provides benefit to projects that can generate power at on-peak periods, but because solar generation no longer aligns with SCE's defined on-peak periods, the value of renewable was not fully accounted for in the RFO. The SEP recommends collaborating regionally to work with SCE and the CPUC to amend the existing procurement process going forward.</i></p> <p><i>While the SEP includes recommendations for streamlining of the Goleta's (and the County & Carpinteria's) permitting and approval process, the City has limited ability to determine the processes for interconnecting DER projects to the utility-owned grid. While it is often slow, the State level is the appropriate oversight level to impact the investor-owned utility's policies, and the SEP includes advocacy as an important strategy. CCE is also discussed as a mechanism to create more local control of interconnection policies (such as the ability to establish a FIT), but this ability is still limited since CCE programs do not own grid infrastructure.</i></p>
<p>5-17-2019 Bob Perry</p>	<p>Goleta – Higher-capacity feeders should be targeted for initial development, and SCE should be required to upgrade lower-capacity circuits as it has budgeted upgrading all 4KV circuits in its General Rate Case. It should also be noted that as distributed resources decrease site grid load, more development should open up capacity. Question: in a grid-modernized</p>	<p><i>Feeder sizing for handling renewable generation output is based upon the highest capacity output. Due to the intermittent availability of most renewable resources, and particularly solar, that maximum capacity will rarely be reached—at most, 2-3 hours per day for 2-3 months of the year. Solar systems typically have higher maximum power capacities than the maximum kilowatt (kW) demand of the building on-site in order to produce</i></p>

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	circuit, shouldn't a site be allowed to export an amount equal to its prior load profile?	<i>100% of the annual energy (kWh) usage in a given building while working around the intermittency issue. If an attached energy storage system can be used to enable a larger capacity solar system, while being programmed to never exceed an export profile that matches the site's maximum usage profile, yes—this should be allowable by utilities. Currently, utilities are working to build comfort and processes for vetting and trusting that such software solutions will work in all cases and will not be a risk for exporting more power than installed feeders and transformers can handle.</i>
5-17-2019 Bob Perry	Goleta - Isn't there currently a way to safe harbor a solar+storage project so long as five percent (5%) of project costs have been implemented by a certain date? Could costs be first applied to pre-installation costs?	<i>Please see Section 4.7.1. Yes, the IRS has issued guidance for ways that developers can be considered to have met end-of-year deadlines through hitting prescribed development thresholds prior to the end of each calendar year. However, the end-of-year step-downs still represent accurate deadlines for developers to meet.</i>
5-17-2019 Bob Perry	Goleta – Comment on Recommended Sites for Development: Primary focus should be on commercial-industrial sites, particularly along the Hollister corridor from Storke to Fairview. According to SCE, C-I account consume almost 70% of system load and have the capacity to become net generators. Properties serviced by a particular segment of a feeder should be approached, with a plan to develop some behind-the-meter	<i>This topic is covered in Section 1.3.2, page 15 and Tables 2-3 & 2-4, and in Chapter 5 on page 38. The SEP identifies the commercial sector, and specifically the large number of business parks in Goleta, as a significant opportunity for more solar development, estimating that less than 2% of the viable commercial and industrial potential has been reached. Tables 2-3 and 2-4 identify estimated solar capacity by generation by sectors. Relative to the residential sector, commercial properties are larger and therefore have</i>

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	interconnection, possibly with a shared energy storage facility. Many business parks should be able to accommodate such a scenario.	<p><i>more rooftop space that is also generally flatter than residential roofs, making it more suitable for solar installations.</i></p> <p><i>As part of the public outreach process during SEP development, a commercial property stakeholder meeting was held in Goleta to understand barriers to commercial property investment and identify potential financing structures that could incentivize landowners. These key stakeholders expressed interest in participating in quarterly learning sessions with renewable energy developers, with facilitation by the City.</i></p> <p><i>Finally, based on communications with private property owners, Optony is analyzing specific opportunities along the identified corridor. The project team has initiated the outreach process and is continuing to engage willing site owners around the findings of the analysis and to gather additional information. For privacy purposes and unless authorization is provided, the private site information will remain confidential.</i></p>
5-17-2019 Bob Perry	Goleta – Site Evaluation Methodology: Is this being pursued at the County level? It seems that any processes should be uniform throughout the county.	<i>Yes, the same general site evaluation methodology is being used to evaluate sites for the County of Santa Barbara and City of Carpinteria as for the City of Goleta.</i>
5-17-2019 Bob Perry	Goleta – Comment on IOUs and Community Solar: California has to shake its community solar stigma and develop a standard approval process. As was discussed in the workshop, school districts share some unique characteristics with distribution grids. Facilities are strategically located equidistant to	<i>It is understood that the availability of community solar would be beneficial in addressing the energy reliance and resiliency challenges faced by the south Santa Barbara coastal communities. To date, the Clean Energy Working Group (CEWG) (consisting of Santa Barbara County and the cities of Goleta, Carpinteria and Santa Barbara), in concert with the SEP process,</i>

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	<p>serve an identified community. School sites are also optimal net generators: facilities have very high potential capacity but require relatively low loads. They also serve as critical facilities in emergency conditions as shelters and staging areas. Lastly, siting advanced distributed technologies on school sites presents an opportunity to develop curriculum to educate and train students, possibly for a vocational career upon graduation from high school or college.</p>	<p><i>has submitted comments to the California Public Utilities Commission on SCE's proposed revisions to the current program, and worked closely with SCE in an effort to develop a program that would encourage participation. The CEWG will continue working with both the local utility and the CPUC in an effort to develop a program that is viable for the community. This item is also addressed in each SEP under the subheading "Work with IOUs to Develop a Community Solar Project".</i></p>
<p>5-17-2019 Bob Perry</p>	<p>Goleta – Comment on Energy Assurance Plans: Such a plan should be developed, and provide additional funding to develop critical facilities as highly resilient microgrids with high solar generation and storage capacity, including in some cases an electrolysis component to create hydrogen supplied for fuel cell fleet vehicles which could serve as emergency generators. There is R&D showing that Fuel cell vehicles are capable of providing power to facilities. This should be explored and anticipated.</p>	<p><i>Energy Assurance Plans are addressed in each SEP. Drafting and adopting such plans will be at the direction of each agency's decision-making body as part of tasks selected to move forward with.</i></p>
<p>5-22-2019 CEC</p>	<p>County – Comment on SEP - We applaud the County and Optony for this comprehensive draft Strategic Energy Plan (SEP) and strongly supports each recommendation being considered thoroughly. We ask the County to immediately act on recommendations to streamline permitting for built-</p>	

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	environment solar and remove barriers to utility-scale solar as identified. We also ask the County to accelerate energy efficiency and renewable energy projects at County-owned facilities.	
5-22-2019 CEC	County – Comment on SEP - Although the SEP is a separate document from the Energy and Climate Action Plan (ECAP), we see opportunities to establish stronger mechanisms within the SEP to be referenced within the next ECAP update. Although the draft SEP clearly establishes opportunities for renewable energy growth within the County, and addresses some key policy barriers, there is a lack of reach codes and other policy “sticks” to encourage distributed renewable energy growth and storage within the community, especially in South County. The SEP addresses distributed-scale solar and storage with opportunities for funding, education, collaborative procurement, and performance-based incentives.	<i>Recommendations from the Strategic Energy Plan that are approved by the Board of Supervisors will be considered and may be incorporated where appropriate with the upcoming ECAP update.</i>
5-22-2019 CEC	County – Comment on additional strategies: Consider reach codes, including those that require solar on new commercial developments paired with storage, cool roofs for residential roofing projects, and solar beyond the minimum required by Title 24 on new residential projects.	<i>Reach codes can be an effective method of achieving increased energy savings and decreased GHG emissions. Not including reach codes as a strategy does not mean they are being ruled out as an option at some point, but that they were out of the scope of the SEP, which was aimed at identifying and removing obstacles to renewable energy development.</i>

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5-22-2019 CEC	County – Comment on additional strategies: Require that commercial property owners get solar quotes with any reroofing project and provide County support in reviewing those quotes and determining project payback.	<i>Similar to reach codes, policy “sticks”, while sometimes an effective option, were not part of the scope of the SEP.</i>
5-22-2019 CEC	County – Comment on additional strategies: In evaluating the opportunities to streamline solar and storage permitting, look beyond an internal team chaired by the County Chief Building Official. Given the standing frustration between the solar community and the Planning and Development Department, the County may consider an independent advisor to guide this process, such as may be provided by the California Solar and Storage Association.	<i>Engagement of and participation from diverse stakeholders in programmatic or process changes often yields more well-thought-out results. County strategy 5.1.1 has been updated to recommend the involvement of a number of outside stakeholders.</i>
5-22-2019 CEC	County – Comment on additional strategies: Include a program (or at least educational outreach) to support local building owners in addressing the split incentives for solar (and storage) wherein the building owner invests in DER but the tenants see the bill savings. If the County has an easy model for actually billing the tenants for the solar energy, or other innovative models that encourage building owners to invest in DER, there may be more investment in that space.	<i>A targeted educational outreach campaign is an activity that would be conducted under the one-stop-shop recommendation (5.5.1).</i>

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5-22-2019 CEC	County – Comment on additional strategies: There is an opportunity to further engage with/invest in the Santa Barbara County Green Business Program and shape the energy savings opportunities that the program promotes.	<i>The County recognizes that engaging with existing programs and entities such as the Santa Barbara County Green Business Program is essential for addressing wide-reaching sustainability and energy issues. While not included in the SEP as a specific strategy, it does not mean that it has been ruled out, but that it was outside the scope of this project.</i>
5-22-2019 CEC	County – Comment on additional strategies: Include specific direction for accessing OBF funding for County facilities. In the SEP, the language describing the inability of the County to use OBF on their facilities classifies the barrier as “... deemed to be relatively simple” and does not include a plan or goal for accessing the funding other than, “clarifying OBF requirements for County facilities with IOUs”. The internal barriers to OBF financing have been a major challenge to implement energy projects and the SEP should include a deeper analysis of the problem and potential solutions.	<i>The County has had challenges with OBF in the past and has made significant strides toward being able to utilize it as a financing option, including during the SEP development process.</i> <i>Expanded discussion of barriers to using OBF to finance internal County projects was not included in the SEP because it is anticipated that these barriers area being dealt with effectively outside of the SEP process.</i>
5-22-2019 CEC	County – Comment on additional strategies: The SEP identifies challenges in developing utility scale solar resources, highlighting those in Southern Santa Barbara County. Given the difficulty of building utility scale renewables in South County coupled with the need for these resources (because of resiliency concerns associated with being at the end of Southern California Edison’s transmission lines),	<i>Section 5.3.2 addresses incentives to increase economic payback and participation. Included are two types of financial incentives recommended: Expected Performance Based Buydown (EPBB) and Performance-Based Incentives (PBI), as well as suggestions on adjusting the incentive amounts and targets.</i>

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	the County should focus their efforts on incentivizing (or requiring in the case of reach codes) distributed solar and storage in South County. Therefore, some of the ideas outlined above may be most appropriate in priority zones that face reliability concerns, such as South County.	
5-22-2019 April Price	County – Do you know why the Ellwood peaker plant wasn't turned on during the power outages associated with the debris flow and Thomas fire?	<i>We are unaware of a reason given by the utility, but this may have had to do with power lines being down—any power pushed through those lines would have put utility workers at risk of electric shock.</i>
5-22-2019 April Price	County – What is the natural gas 56.7 MW facility in the map below- is that La Goleta Storage Facility's	<i>The 56.7-MW facility is the Ellwood Generating Station. The 49.8-MW natural gas facility listed is the Exgen or Santa Ynez plant located in Las Flores Canyon between Refugio and El Capitan State Beaches.</i>

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	<p>own on-site gas combustion for electricity?</p>  <p>The map displays various energy sources across Santa Barbara County. Callouts include: Landfill Gas (1.4), Solar (1.5), Landfill Gas (3), Natural Gas (49.8), Natural Gas (56.7), and Fuel Cells (0.2 MW). The map also shows the locations of Santa Maria and Lompoc.</p>	
<p>5-22-2019 April Price</p>	<p>County – Does the County have a list of sites that they are considering for solar installs that just wasn't included in this draft report? If so, can you share that with us? We may be able to add to your list.</p>	<p><i>Yes, the County has a list of potential sites, but private sites may not be shared without property owner permission. An anonymized version of this list will be included in the final report. Recommendations of additional potential sites are welcomed.</i></p>
<p>5-20-2019 Swell Energy</p>	<p>To all – Comment on Solar and Storage: Solar and storage developers experience many various interpretations of code, timelines for approval, costs of permitting and inspection hurdles. If the regional</p>	<p><i>The Santa Barbara County Climate Collaborative is a new initiative led by the County of Santa Barbara with participation by multiple jurisdictions throughout the County to coordinate climate mitigation and adaptation efforts across several sectors,</i></p>

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	<p>governments can work together to align their processes, code interpretations, reduce permitting costs and have consistent inspection methodologies, developers could pass along these associated reductions in our soft costs for project development to the consumer, thereby increasing adoption of these technologies. Consider working with industry to use an installer-developed design and installation manual for residential and small commercial energy storage projects, which could help to streamline and reduce costs for permitting of these projects.</p>	<p><i>including electric reliability and resiliency. This multi-jurisdictional, collaborative framework may be a way to address inconsistency in permitting and inspection of solar + storage projects. Strategy 5.1.1 in the County's SEP, recommends creating a team of local government staff and industry representatives to create a set of standardized criteria for such systems.</i></p>
<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Incentives: It was proposed to institute a Performance-Based Incentive (PBI) that rewards combined solar + storage installations. As an alternative, provide up-front incentives for customers to add battery storage to their existing or new solar projects. These energy storage projects, if mandated to discharge during peak hours and charge during non- peak hours during the solar window, will help stabilize the regional grid and allow for increased penetration of solar generation. In addition to this, we'd recommend that the storage projects not only be compensated for their impact to the grid and goals to achieve 100% renewable energy but they also be awarded "micro-</p>	<p><i>PBIs are included in the executive summary discussion, as well as under the subheading "Altered Time-of-Use Rate Schedules". While PBIs could be effective, they are cost-prohibitive without the launch of a CCA program</i></p> <p><i>The value of upfront incentives to drive storage retrofits on existing solar projects is recognized for the Goleta SEP, but more scoping would likely need to be done to determine the appropriate scale of this program, given its possibly small audience. This suggestion will not be ruled out by the City.</i></p>

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	grid resiliency participation points” whereby each on-site renewable+storage project could receive additional incentives if their home or building would be listed as a site that could be used by emergency services and the community during extended outages.	
5-20-2019 Swell Energy	To all – Comment on Collaborative Procurement: A recommendation was made to host collaborative procurements to bargain for better prices from solar vendors. Bulk discounts and community wide partnerships can absolutely support reduced costs for larger projects. However, selecting only one vendor may have negative impacts on local workforce and labor utilization and regional economic development. For smaller scale on-site renewable and storage projects, due to the complex nature of various projects and technologies, along with various business models and financial structures, a bulk purchase with one vendor could limit the potential for commercial and residential on-site developers to provide their unique solutions to the consumers.	<i>This comment is addressed under “Altered Time-of-Use Rates”. While there are challenges to collaborative procurements, it is something that will continue to be explored.</i>
5-20-2019 Swell Energy	To all – Comment on CCA: We support the development of a CCA to be able to better control the supply and management of load in Santa Barbara County. A CCA would allow preferred	<i>The County, in partnership with the Cities of Goleta, Carpinteria, and Santa Barbara, commissioned a study in 2018 to analyze the viability of a Community Choice Energy (CCE) program serving Santa Barbara County. While that study indicated feasibility under</i>

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	<p>procurement of local resources such as Community Solar and Demand Response solutions. With more local resources for renewable energy generation and energy storage, the CCA could then manage these resources directly and even develop the ability to isolate the community at the primary substations through a community scale micro-grid during emergency situations such as wildfires, mud-slides, earthquakes, terrorism/war, or any other emergency event that would warrant local control of energy infrastructure.</p>	<p><i>certain scenarios, subsequent regulatory and legislative changes in a rapidly transforming electricity market and policy environment compelled an update to this feasibility study. It is anticipated that the participating jurisdictions will return to their respective decision-makers with the results of the updated feasibility study in July 2019 for further consideration of the findings and next steps.</i></p> <p><i>Should participation in a CCA move forward, it would likely not procure all its electricity locally and would therefore not immediately resolve local resiliency issues. However, compared to an IOU, a local CCA will be more mission-driven to focus on local solar siting, and could work more directly with local stakeholders to develop local renewable electricity programs.</i></p>
<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Loan Loss Reserves: Based on our experience, loan loss reserve programs to reduce a regional lender’s interest rates on unsecured loans create difficult processing and are only successful if sufficient volume is achieved. If an interest rate for a residential unsecured loan could be between 0% to 4.99%, this will spark interest in the community and within the developer community of partners that would offer the loan. Above 4.99% will begin to compete with other private funds and may be less attractive to the developer partners that would use them if the processes aren’t extremely</p>	<p><i>It is understood that the availability of easy, affordable financing would be beneficial in stimulating uptake of renewable energy and energy storage development. Significant past experience with loan loss reserve programs will inform any future programs that are developed.</i></p>

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	<p>simple to apply for and fund a loan. That said, if the loan loss reserve fund could be used to provide a risk-free loan to government agencies to implement on-site solar, efficiency, and energy storage solutions, this could catalyze municipal development of energy projects.</p>	
<p>5-20-2019 Swell Energy</p>	<p>To all – Comment on Financing: On-bill financing (OBF) can provide a cost-effective method of financing DER deployment, but OBF has traditionally suffered from high administrative costs and red tape. If SCE were able to implement 0% on-bill financing for commercial energy storage systems and solar through their Express Solutions, this could be a great offer for local governments and other public entities as well as regional businesses to finance on-site energy storage, provided that the funding mechanisms and compliance protocols aren't so onerous as to render the program cost-prohibitive. Additionally, if a 0% residential on-bill financing program existed through SCE (or a future CCA) this would represent an attractive offer that regional developers of energy storage and solar projects would utilize to make projects pencil out for homeowners. Again, in the residential case, the administration of such a program would have to be simplified in order to reach widespread adoption.</p>	<p><i>It is understood that the availability of easy, affordable financing would be beneficial in stimulating uptake of renewable energy and energy storage development. To date, the Clean Energy Working Group (CEWG) has worked closely with IOUs in an effort to identify feasible solutions. The CEWG will continue working with both the local utilities and the CPUC in an effort to develop programs that are viable for the community.</i></p>

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<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Third-Party Ownership: Third-party ownership of energy storage assets presents a unique opportunity to offer low-cost monthly payments for “energy storage as a service” to be offered to residential and commercial customers to provide energy savings and backup energy security to consumers while also solving the problems of local renewable energy resiliency and goals to achieve 100% renewable energy. We recommend community support and advocacy for these solutions for end-consumers, as well as for implementation on public facilities.</p>	<p><i>The Goleta SEP includes an explanation of various financing options including Direct Purchase, Third-Party Ownership – Power Purchase Agreement, and Hybrid Purchase options. Information on these options could be made available through the One-Stop Shop, which would act as the main hub and point of contact for information for all new programs and policies implemented due to SEP recommendations (Strategy 6.5.1). Additionally, Strategy 6.4.1.3 recommends evaluating opportunities for supplementing existing diesel generators with battery storage as part of creating and implementing an Energy Assurance Plan for the City’s critical facilities. Further, the SEP recommends that battery storage for electricity backup be included in the design considerations of new facilities such as Fire Station 10 and the train station.</i></p>
<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Energy Assurance Plan: We highly recommend considering on-site renewable energy + energy storage for inclusion in the Energy Assurance Plan for local emergency preparedness, and we see this as a vital element to consider in creating a resilient and renewable community. Due to the ease of implementation with small-scale energy storage projects (< 10 kW), we believe that this technology can support numerous benefits to the on-site user while also serving as a resource for local community preparedness and distributed renewables.</p>	<p><i>Some potential considerations for an Energy Assurance Plan are addressed in section 5.4.1. A focus on sites with opportunities for both renewable generation and battery storage is included in the recommended action.</i></p>

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<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Recommended Projects: Energy storage installed on a home can provide savings to the owner by charging the solar during off-peak hours and using that solar energy in the home during on-peak periods. In addition to these benefits of time-of-use (TOU) arbitrage, the system will provide a community node of energy security and, when combined with solar, can then provide perpetual self-sufficiency entirely during an emergency. This will allow this resident to back up their essential circuits such as lighting, refrigeration, communications and ventilation. This residence can also serve (at the owner’s discretion) as a neighborhood resiliency hub which residents can go to during an emergency to recharge their phones/devices and have access to energy for any other emergency need.</p>	<p><i>It’s recognized that there are many benefits that battery storage may provide with regards to reliability and resiliency. While not included in the SEP as a specific strategy, it does not mean that it has been ruled out, but that it was outside the scope of this project.</i></p>
<p>5-20-2019 Swell Energy</p>	<p><u>To all</u> – Comment on Recommended Projects: Often the high costs of solar and aesthetic design standards may make solar difficult to develop for the common space/community areas in multi-family housing. A battery, however, can be easily installed to provide TOU arbitrage services to the building while also providing backup energy during an emergency. Without solar, the duration of the energy storage supply will be based on the</p>	<p><i>It’s recognized that there are many benefits that battery storage may provide with regards to reliability and resiliency. While not included in the SEP as a specific strategy, it does not mean that it has been ruled out, but that it was outside the scope of this project.</i></p>

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	consumption of the energy. Small refrigeration, lighting and recharging of devices are relatively low consumers of energy, so these areas could become safe zones for communities during emergencies.	
5-20-2019 Swell Energy	To all – Comment on Recommended Projects: The following public infrastructure could benefit from having small-scale energy storage with local energy backup by both providing TOU arbitrage and bill savings for the agency that owns this infrastructure, while also maintaining essential services during grid outages: Street lighting; Electric water and gas safety shutoff valves; Communications; Stop Lights/ Crosswalks	<i>The benefits of energy storage at public facilities is recognized and considered throughout the SEP, particularly in section 5.4.1 of the County SEP (see below).</i>
5-20-2019 Swell Energy	To all – Comment on Recommended Projects: The following locations present additional opportunities for the installation of energy storage to provide TOU arbitrage savings, reduced peak energy with stored solar-window off-peak energy, and emergency preparedness. In some cases, the energy storage systems would be installed alongside additional self-generation systems and provide additional resiliency to these systems while offering additional savings and community services to support 100% renewable goals: Fire Stations, Paramedics/Ambulances, Police; Small Business and Nonprofits; Restaurants, Coffee Shops, Groceries; Health Clinics and Urgent Care	<i>The identification of critical sites for onsite renewable energy and energy storage is addressed in section 5.4.1 of the County SEP as part of the Energy Assurance Plan recommendation.</i>

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	Facilities; Gas Stations; Day Care/Preschools, Public Schools, Private schools, and Colleges (including UCSB); Libraries; Neighborhood and City Community Center; Recreation Centers; Fairgrounds; Shopping Centers	
5-20-2019 Swell Energy	<p>To all – Comment on Public Outreach: A solution was proposed to create a countywide resource one-stop shop and hub for advertisements. While we general are in support of this, it will also be important for there to be a focus on collaboration with all agencies and interest groups that are promoting renewable energy and local energy resiliency, including, but not limited to, local governments, utilities, non-profits, faith based groups, schools, youth groups, workforce development groups, and businesses. Additional activities that are recommended for collaborative outreach campaigns include the following: Social marketing; Door-to-Door advocacy and engagement campaigns with local students; Billing inserts by utilities including electric bill, gas bills, water bills, and trash/recycling; Direct mail by participating businesses with use of a local “Certification” to show inclusion in program; Tabling at events and frequently travelled locations such as grocery stores;</p>	<p><i>Development of a one-stop shop for information has been addressed in the SEP. In addition to exploring development of an educational hub, the CEWG members will continue to work with the Community Environmental Council and other local non-profits on and explore new ways to reach out to the community at large.</i></p>

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	Workforce Training Programs; K-12 Energy Education Programs and Partnerships.	
5-16-2019 Kim Jones	Goleta - Who will lead the effort to further renewables development after the consultants are gone? Will the Cities and County have dedicated staff for pursuing the findings?	<i>Reaching the City of Goleta’s 100% renewable target will require engagement, action and leadership from many sectors. Internally, the City will need to build on its organizational staffing capacity and plan for financial resources to support the efforts and implement the plan. Actual staffing needs will depend on specific implementation actions undertaken as prioritized by the City Council following adoption of the plan. Continued regional collaboration and partnerships will also be critical to support reaching renewable energy goals. The Tri-County Regional Energy Network and Santa Barbara County Climate Collaborative are two examples of existing regional efforts that could be leveraged now.</i>
5-16-2019 Kim Jones	Goleta - How will citizens stay informed of the progress on removing barriers and of opportunities to advocate for further changes, like net metering between multiple sites for public entities like schools and water districts or furthering a CCA? People find it comforting to work on and stay informed about efforts to combat climate change in a meaningful way.	<i>Stakeholder involvement and community outreach are essential to the success of the SEP and the City of Goleta’s transition to 100% renewable energy. It is anticipated that beyond outreach for specific projects that may take place, the City will continue to utilize the Monarch Press newsletter, regular social media posts, and City Council Green Committee meetings to provide updates and solicit input. Additionally, incorporating Spanish language inclusion on materials and during events could expand outreach within the community.</i>
5-27-2019 Lee Ann Palmer	Goleta - As the City of Goleta considers a site for a large-scale battery energy storage system, has the old Vulcan plant at the end Ellwood Station Road	<i>This parcel is currently shown in the City of Goleta’s Capital Improvement Program (CIP project #9027) as located adjacent to Alternative 7 for a potential US 101 Overcrossing. The CIP project</i>

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	<p>been considered? Development at that location would also help to remove what is currently an underutilized site that may be considered a community eyesore.</p>	<p><i>is in preliminary phases and under re-evaluation. The Planning & Environmental Review Departmental Work Plan includes a task by the Current Planning Division to comprehensively evaluate the suitability of utility-scale battery storage facilities within the City and identify in what land use designations and zones such projects would be compatible. It is unknown if this particular site has been considered by a private developer for such purposes.</i></p>
<p>5-23-2019 Elliot MacDougall</p>	<p>County – Comment on Zoning: The cap for solar projects to be permissible in AG-I and AG-II zoning should be increased from 1MW to 3MW, because this 3 MW cap is more in-line with existing caps through utility Fast Track interconnection rules and the CPUC’s ReMAT program. The increase of a 1MW system to a 3MW system is a relatively small increase in acreage usage, while continuing to require a Conditional Use Permit for projects over 3MW. Enabling more projects to proceed through streamlined utility approval processes will increase the likelihood that more and larger projects will actually move into construction.</p>	<p><i>The importance of aligning local regulations to State and utility policies, with an eye toward easing the burden on renewable energy developers, is understood. This change is being considered for inclusion in Section 5.1.2 of the County SEP.</i></p>
<p>5-23-2019 Elliot MacDougall</p>	<p>County – Comment on Ag Lands: More solar projects on agricultural lands could be built if the County created a streamlined or automatic cancellation process to remove land from Williamson Act contracts upon solar projects receiving building permits.</p>	<p><i>It is recognized that the Williamson Act poses a significant barrier to much of the agricultural land in Santa Barbara County. While we have little influence on the Williamson Act itself, the County enforces the Williamson Act with its Uniform Rules for Agricultural Preserve, which we do have more control over.</i></p>

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		<i>Changes to the Uniform Rules are addressed in section 5.1.3 in the County's SEP.</i>
5-30-2019 Michael Chiacos	County - Do you know if the analysis will look at potential for floating solar in SB County? A town in NorCal is doing a 1.78 MW project and other small commercial systems have been built in CA and around the US. Perhaps not as relevant for SB, but maybe for CA is floating solar on reservoirs with dams, so the solar can increase the capacity factor of the dam and utilize the transmission built for it. A World Bank report describes the market and also mentions 10 dams around the world that could produce 1-10 GW solar each by only using 1-4% of the surface areas of the reservoirs.	<i>We did consider floating solar, specifically on Lake Cachuma, early on in the project. There were some significant barriers including its recreational use, drastically changing water levels, numerous water agencies with contracted access, and federal ownership that led to it being ruled out as an immediate project to pursue. My understanding is that floating solar is also significantly more expensive, around 50% more, than ground-mounted or rooftop systems.</i>
4-22-2019 Jeff Hanson	Goleta - I am surprised there is no mention of the 50MW peaker plant within the city limits on Las Armas Ave. This plant could be life-saving if we lose our connections to Santa Clara substation in Ventura where all of our power comes from. I understand NRG Energy is considering replacing the MG set with a large battery system. The infrastructure is already there! It seems to me that the City should be including this facility as a low-cost method of achieving its goals.	<i>The use and future of the Ellwood Generating Station on Las Armas Ave. has been the topic of frequent debate at the California Public Utilities Commission (CPUC). As of December 2018, the CPUC has determined that the facility must remain in operation as a peaker plant. Specifically, in July 2018 California Independent System Operator concluded that Ellwood was required for the reliable operation of the transmission system in 2019 and authorized the designation of Ellwood as a reliability must-run resource. Effective December 2018, the CPUC authorized SCE's request to contract with GenOn Energy Management, LLC (a former subsidiary of NRG Energy, Inc.) for</i>

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		<i>operation of Ellwood through 2020. In the future, the plant's usage may change, and clean energy or energy storage options could be explored at the facility at that time, in conjunction with the site owner/operator, SCE, and the CPUC.</i>
4-27-2019 Bill Woodbridge	Goleta/County - Where could a solar farm be built in the City or County? We need a bunch of them in the county, as well as wind farms!	<i>Several potential locations in the County are under consideration, though constraints related to agricultural use (Williamson Act) and other considerations, such as availability of grid infrastructure and environmental impacts on wildlife, do limit the number of locations likely to be commercially feasible.</i>
4-27-2019 Bill Woodbridge	Goleta/County - Does the City or County own any land on which power generating wind mills could be placed? They provide much greater energy than solar.	<i>Unfortunately, much of the County-owned land where there may be space for the development of a wind farm features a fairly weak wind resource, from the perspective of the industry. Private or federal lands may offer more potential, depending on other land-use constraints.</i> <i>There is no publicly owned land of suitable size and wind resource to support a utility-scale wind project in Goleta.</i>
5-14-2019 W. Michael Hackett	Goleta – Comment on SEP: I support the direction outlined in the City's SEP Plan, particularly the 100% renewable energy (RE) goal for the City and greater Goleta community, and the community outreach activities referenced in the Plan. The best way for the City to demonstrate its commitment to the Plan goals, and its commitment to RE, is to move quickly to install the solar project at the library referenced in the Plan. With limited City-owned facilities, the	<i>The City has taken numerous steps to adopt policies and implement projects that support energy conservation, efficiency, and renewables, but it is recognized the City should continue to take steps to lead by example with its own facilities and operations that will help provide community-wide visibility and build momentum in SEP implementation. The SEP includes a detailed technical assessment and financial analysis of potential solar photovoltaic (PV) project development opportunities at sites owned by the</i>

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	library is the most logical site. A proactive "lead by example" strategy is particularly critical at the outset. The tax benefits, relied on by solar investors to finance projects for local governments, particularly Investment Tax Credits referenced in the Report, begin reducing this year, and will continue to diminish over the next 3 years. Fewer solar financing groups will be available to fund municipal projects or offer more attractive rates than currently available. Time is of the essence. The same timing issue applies to other non-residential solar projects.	<i>City of Goleta, including the Library and recommends under Strategy 4.7.1.2 a Public Power Pool as one way to take advantage of the current Investment Tax Credit (ITC) while it lasts by enabling multiple public agencies to proceed with procurement before the planned ITC step-down. The City Council will provide direction on implementation priorities.</i>
5-14-2019 W. Michael Hackett	Goleta – Comment on Nonprofit Solar: Often overlooked are opportunities available to non-profits (churches, schools, other NP facilities) that can install solar by deploying the same solar power purchase agreement (PPA) to finance projects at their own locations; receive a fixed cost of power; and eventually own the system - generating their own power over an extended period. There are developers who specialize in developing solar projects for NPs, including the funding mechanism.	<i>Financial structures such as PPAs are explored in the SEPs under Financial Structure Details. Schools are regulated by the state and have separate programs for participation. Some engagement with other public entities and non-profits was included in the SEP process. We will continue to encourage other organizations to take advantage of group purchase options available to them.</i>
5-14-2019 W. Michael Hackett	Goleta – Comment on Community Outreach: Educating commercial and multi-family property owners and residents about the benefits of solar and available financing options is critical in achieving the community wide 100% RE goal. Forums which	<i>This has already been addressed above (see One-Stop Shop Concept Strategy 6.5.1).</i>

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	<p>address these issues will also help identify and solidify potential solar sites and move owners and others to support the City's Plan. Essential stakeholders for outreach would include the City's largest commercial property owners/investors, Chamber, local environmental groups/individuals, HOA organizations, non-profits, and others who have expressed interest in solar or would benefit directly or even indirectly from a well-planned project(s).</p>	
<p>5-14-2019 W. Michael Hackett</p>	<p>Goleta – Comment on Priorities: We would recommend, once the Council formally approves the SEP, the City move quickly to the implementation stages - first on solar for the Library - a project demonstrating the City's commitment and viewable by all residents; and, second with community forums designed and promoted to reach particular stakeholder groups as referenced above and in the Plan. Targeted outreach would narrow the issues for each forum and enhance prospects for positive and more immediate outcomes, including commitment and timely installation of projects.</p>	<p><i>It is recognized the City should continue to take steps to lead by example with its own facilities and operations that will help provide community-wide visibility and build momentum in SEP implementation. The SEP includes a detailed technical assessment and financial analysis of potential solar photovoltaic (PV) project development opportunities at sites owned by the City of Goleta, including the Library and recommends under Strategy 4.7.1.2, a Public Power Pool as one way to take advantage of the current ITC while it lasts by enabling multiple public agencies to proceed with procurement before the planned ITC step-down. The City Council will provide direction on implementation priorities.</i></p> <p><i>With regard to community forums, information on various events could be made available through the One-Stop Shop, which would act as the main hub and point of contact for information for all new programs and policies implemented due to SEP</i></p>

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		<p><i>recommendations (Strategy 6.5.1). As an example of a forum to reach particular stakeholder groups, key commercial property owner stakeholders expressed interest in participating in quarterly learning sessions with renewable energy developers, with facilitation by the City, consistent with the comment.</i></p>
<p>5-29-19 Bill Shelor</p>	<p>Goleta – Comment on Coordination of City Boards & Commissions: A significant number of development projects in Goleta are reviewed by various City Boards and Commissions (Planning Commission, Design Review Board, and Parks and Recreation Commission). In order to maximize the impact these Boards and Commission should have on promoting the priorities of the City Council, I would like to suggest that all Board and Committee members (and the staff that support them):</p> <ol style="list-style-type: none"> 1. be made fully aware of the City Council resolution to move expeditiously to 100% renewable energy 2. be oriented on the considerable planning efforts that are currently being undertaken to implement the City's GHG reduction goals. Each of these Boards and Commission should be required to consider this City Council priority during concept review, project design review, and project approval. 	<p><i>We agree with the important role that City Boards & Commissions will play in implementation of the Strategic Energy Plan. After adoption of the plan, currently scheduled for July 16, Goleta can do a formal roll-out and inform City review bodies and supporting staff of the priorities discussed in the plan. This is one of the first steps in implementation of the plan.</i></p>

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	<p>When appropriate, incorporation of PV should be a condition of project approval, and should only be waived if the applicant can prove infeasibility. Planning staff should work closely with all projects applicants during the initial consultation phase to ensure applicants are fully aware of the City's GHG reduction priorities.</p>	
<p>6-12-19 George Relles</p>	<p>Goleta – Comment on Need for Residential Efficiency and Demand Response: Similar to efforts undertaken in response the drought, the City should highlight the importance of residential energy conservation and incentivize residential energy efficiency efforts and reduction in usage during peak load times. Ideas (some from Advance Energy Economy) include;</p> <ul style="list-style-type: none"> • Offer incentives for energy usage during off-peak times (for electric vehicles) • Promote more solar & selling power back to grid • Install smart appliances operating on timers that prioritize off-peak usage <p>The City should also use outreach to communicate successes to the community.</p>	<p><i>The concepts discussed are all important aspects of a renewable energy future. Section 6.5.1 of the Goleta SEP discusses the concept of a One-Stop Shop that can be established to function as the main hub for communication of new and existing energy programs to the community. It can be used to promote residential participation in other SEP strategies such as financial incentives for solar or to establish new campaigns for energy efficiency. This is also the method by which the City can highlight successful energy projects and efforts and communicate the benefits to the community. Finally, the One-Stop Shop can provide resources on County and region-wide energy programs, such as the residential and multi-family energy efficiency programs slated to be offered by the newly formed Tri-County Renewable Energy Network (3C-REN).</i></p> <p><i>Some residential efficiency and demand response programs, while supported by the City, are, without the formation of a CCE program, beyond the City's scope. Incentivizing off-peak charging for electric vehicles is an example of an effort best</i></p>

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		<i>advance by the electric utility or CCE. Section 6.5.2 of the SEP includes discussion of the City's ability to advocate for its priorities at the state and federal level.</i>
6-6-19 Doug Small	<u>Goleta – Comment on Identification of Sites:</u> <u>Inquired about how to find land that is available and suitable for renewable energy projects. Are the cities of the County the best avenue to inquire through?</u>	<i>A priority of the SEP process, particularly for the County, is identification of viable sites for large-scale renewable development. The project identified a list of private sites. However, due to privacy concerns, the contact information and details of these sites will not be released without permission from the landowners. The County SEP is the best place to review the site list and will include any private sites that have given permission for public release. The County SEP includes all sites in Goleta and Carpinteria, as well as sites in unincorporated communities.</i>
5-6-19 Jonathan Kevles (Amaresco)	<u>County – Comment on County-wide Load & Demand:</u> <u>What is the County-wide electricity usage and peak demand, particularly in relation to the renewable potential identified.</u>	<i>The County SEP focused on identification of renewable generation potential, barriers to development of this potential and siting opportunities for this potential. The type of energy system planning for which electricity usage, peak demand and coincident generation would be a foundation of was not a part of the project scope.</i> <i>However, given the 100% renewable energy goal passed by Goleta, electricity load was projected, and the impacts of the SEP strategies modeled, and included in the Goleta SEP.</i>

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<p>5-6-19 Jonathan Kevles (Amaresco)</p>	<p>County – Comment on electricity usage at Critical Facilities: <u>Given the focus on resilience, are there figures showing the electricity usage at critical facilities to provide an idea of the generation needed to keep them running during emergencies?</u></p>	<p><i>The urgent importance of reliable, clean generating resources to sustain critical facilities during disasters is acknowledged and should not be shortchanged. Identification of critical facilities and granular planning for how to keep those facilities operating is the core issue to address in the Energy Assurance Plan discussed in the County SEP (Section 3.5.3 & 5.4.1) and both City SEPs.</i></p>
<p>5-6-19 Jonathan Kevles (Amaresco)</p>	<p>County – Comment on solar potential methodology: <u>Does the solar potential methodology include any consideration of on-site load that would limit development potential?</u></p>	<p><i>The solar potential statistical methodology does not directly consider on-site load as a constraint. However, the methodology does apply fairly stringent participation factors that reduce the potential estimates and are intended to encompass many constraints, with on-site load being one of them.</i></p>
<p>5-6-19 Jonathan Kevles (Amaresco)</p>	<p>County – Comment on RES-BCT: <u>It would be helpful to mention the Investor-owned Utilities (IOU's) Renewable Energy Self-Generation Bill Credit Transfer (RES-BCT) Program given the significant room left in the programs for both SCE & PGE.</u></p>	<p><i>RES-BCT is a program offered by California's three IOUs that allows local governments to generate renewable energy at one facility and receive a bill credit for that generation at other facilities that do not have renewable energy generation systems. RES-BCT was considered as a strategy to maximize renewable development at County owned sites. The County and the Cities are aware of this as an option when developing their own sites, pending the economic viability.</i></p> <p><i>The possibility of RES-BCT being leveraged through a public - private partnership was also discussed throughout the project but more research is needed.</i></p>

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5-6-19 Jonathan Kevles (Amaresco)	County – Comment on biogas potential: Is methane capture at closed landfills in the County an opportunity?	<i>Methane capture is currently being used to generate energy at the Tajiguas Landfill.</i>
5-6-19 Jonathan Kevles (Amaresco)	County – Comment on Biomass: <u>It might be useful to acknowledge the controversy around using biomass as an energy source due to its potential to be used for other purposes such as conversion to high quality compost for carbon sequestration</u>	<i>The competing uses for biomass are acknowledged in the County SEP (Section 2.4.3) and the availability of biomass as an energy resource is considered in the underlying data used to assess potential.</i>