

Utility-Scale Solar definition needs to be amended in Santa Barbara County

Currently, Santa Barbara County defines utility-scale solar in a manner that preempts front-of-meter (FOM) solar on built environments and drastically limits the opportunity to deploy commercial-scale solar throughout the County. To fix the issue, the following details are provided in this document:

- 1) Existing definition of Utility-Scale Solar.
- 2) Amended definition of Utility-Scale Solar.
- 3) Both instances where the definition appears in Santa Barbara County code.
- 4) Direct Relief case-study illuminating the critical importance of amending the definition.

Existing definition of Utility-Scale Solar Photovoltaic Facilities:

Utility-Scale Solar Photovoltaic Facilities. Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power.

Proposed amended definition of Utility-Scale Solar Photovoltaic Facilities: [Note that the only changes to the existing definition are the underlined additions.]

Utility-Scale Solar Photovoltaic Facilities. Facilities that are <u>not on built environments and</u> connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power. <u>Solar facilities of any size that are constructed on built environments, including rooftops, parking lots, and parking structures; and within property setbacks thereof; are not utility-Scale Solar facilities.</u>

The amended definition needs to be applied in the following two places:

- 1. Santa Barbara County Comprehensive Plan, Land Use Element
 - Utility-Scale Solar Photovoltaic Facilities: Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power.
 - Santa Barbara County Comprehensive Plan, Land Use Element. County of Santa Barbara. Amended December 2016. Pg 150. Found here: http://longrange.sbcountyplanning.org/programs/genplanreformat/PDF docs/LandUseElement.pdf.
- 2. Santa Barbara County Land Use and Development Code, Definitions
 - Utility-Scale Solar Photovoltaic Facilities: Facilities that are connected to the electrical grid on the utility side of the electric meter and are built for the primary purpose of generating and selling wholesale power. The electricity generated by the facility is not primarily used for on-site activities (such as farming or domestic water heating).
 - Santa Barbara County Land Use & Development Code. (September 2018).
 County of Santa Barbara Planning and Development. Chapter 35.11, Pg
 64. Found here: http://sbcountyplanning.org/pdf/forms/LUDC/LUDC.pdf



Direct Relief example

Direct Relief serves as a prime example of why Santa Barbara County needs to remove its current preemption of front-of-meter (FOM) solar on built environments: Direct Relief's headquarter location in Santa Barbara County has far more rooftop and parking lot solar siting opportunity than its existing 320 kW solar project utilizes. Net Energy Metering (NEM) and more general behind-the-meter (BTM) constraints limit Direct Relief to 320 kW of solar even though its built-environments can support almost four time that amount of solar. The currently wasted ~75% of Direct Relief's solar siting opportunity, which Direct Relief is interested in harnessing in support of the Goleta Load Pocket (GLP) Community Microgrid, requires the ability to connect the additional FOM solar on built environments.

Existing Situation



320 kW PV

*Limited by Net Energy Metering constraints.

Potential Situation

33 kW PVParking potential

353 kW PVParking potential



747 kW PV

Flat roof potential *Includes existing 320 kW

1,133 kW PV of total potential

* Combination of flat roof and parking potential