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May 18, 2017

CITY CLERK, FRESNO CA

Yvonne Spence, City Clerk
City of Fresno
2600 Fresno Street
Fresno, CA 93721
clerk@fresno.gov

RE: Resolution to Comply with Section 66015 of the California Government Code

Dear Members of the Fresno City Council:

California Solar Energy Industries Association (CALSEIA) understands that the City of Fresno may be currently assessing solar permit fees in excess of state limits. We also understand the City of Fresno is considering a resolution to justify charging fees in excess of those state limits. CALSEIA opposes the resolution, and seeks to work with the City of Fresno to streamline its permitting process and lower its permit fees.

CALSEIA is supportive of permit fees to pay for a jurisdiction's costs of permitting and inspections and would like to work with the City in a collaborative spirit to make the permitting process effective and easy for both applicants and City staff, lowering the costs to all parties. However, we are concerned that excessive permit fees discourage customers from adopting clean energy solutions.

Section 66015 (a)(1) of the California Government Code states that the permit fee for the installation of solar energy systems for residential customers "shall not exceed five hundred dollars (\$500) for systems up to 15kW plus fifteen dollars (\$15) per kilowatt for each kilowatt above 15kW."

To our knowledge, the City's current solar permitting fees are calculated as follows: ¹

- First 10 solar panels: \$114.47
- Each additional 10 panels over 10: \$87.22
- Standard Electrical fee: \$81.76
- Residential Solar Plan Check fee: \$80.35

We also understand that several variable fees are charged per each application as well, including a Microfilm/Scanning fee, General Plan Surcharge, Misc Res PC Fee, all of which contribute to permit fees in excess of \$500.

¹ City of Fresno, Development and Resource Management Department, Building and Safety Services, Residential Photovoltaic Submittal Requirements, p. 2, *available at* <https://www.fresno.gov/darm/wpcontent/uploads/sites/10/2016/11/SolarPVPolicyrev.pdf>.

Section 66015 (e) of the California Government Code states that the residential permit fee means “the sum of all charges levied by a city, county, city and county, or charter city in connection with the application for a rooftop solar energy system.” Therefore, even if the charge for residential photovoltaic-specific charge is less than \$500, the total of all fees cannot exceed \$500 for residential rooftop systems less than 15 kW.

Using the aforementioned fee schedule, including the additional variable fees, CALSEIA members are reporting they are routinely charged permit fees in excess of \$500 for residential solar permits up to 15kW. CALSEIA members have also reported similarly sized systems installed in the adjacent city of Clovis to be considerably less. For example, a permit issued in April, 2017, for a 5.8 kW system installed in Fresno cost \$482.87, but a slightly smaller 4.42 kW system installed in Clovis cost \$162.88 for a permit issued in February, 2017. A larger system of 8.99 kW in Fresno cost \$570.12 for a permit issued in April, 2017, but for a similar sized system of 8.68 kW in Clovis, the permit issued in March, 2017, cost \$295.88. Clearly, if a smaller jurisdiction can charge less for a comparable solar permit, the City of Fresno could lower their permit fees.

Furthermore, these additional fees do not result in a quick and streamlined process, as reported by CALSEIA members. For instance, City Ordinance No. 2015-26 established an expedited process for Small Residential Rooftop Solar Energy Systems in which processing timeframes shall not exceed three days. It has also been brought to our attention that some CALSEIA members are experiencing processing timeframes between 7-9 business days. Additionally, that same ordinance requires the City to accept electronic submittal of the permit applications; however, our understanding is that the City has not yet established an online, fax or email submission process for these applications.

Therefore, CALSEIA respectfully requests that the City of Fresno reject the proposed Resolution, and consider adoption of a new Resolution to establish fees that meet the \$500 residential permit fee cap, as well as establish an expedited process to ensure streamlined processing of small residential rooftop solar energy systems. We are happy to work with the City of Fresno to improve efficiencies in the permitting process and achieve the goals and processes established in City Ordinance No. 2015-26.

Sincerely,



Kelly Knutsen
Senior Policy Advisor
CALSEIA