

From: Maureen McDonald [maureenmcdonald@solarrus.com]
Sent: Wednesday, July 18, 2012 9:39 AM
To: Kinkle, Sherrie L
Cc: David Young
Subject: GUIDELINES FOR ACTIVE SOLAR ENERGY SYSTEMS NEW
CONSTRUCTION EXCLUSION

Can you clarify the following paragraph? My question is if the solar is put on carports in a church parking lot thereby allowing the parking lot to continue to be used for parking for worship services and there is a lease for the system (System owned by a third party and Church purchases energy from that system under a Power Purchase Agreement), does the parking lot still enjoy the exemption for religious purposes? In other words, has the Church not lost any property-tax exemption and the solar system is not assessable under the active solar energy exclusion?

Thank you.

Property of Exempt Organizations 16 7. **A religious organization has leased a portion of its property to a for-profit entity 17 for the installation of an active solar energy system. What is the status of their 18 property tax exemption(s)?** 19 The portion of the religious organization's property that is leased for the solar energy 20 system would not qualify for the church, religious, or welfare exemptions. However, 21 disqualification of the exemption for the portion of the property leased for the solar energy 22 system does not, by itself, jeopardize the organization's qualification for exemption on the 23 remaining portions of the property that are used exclusively for religious worship (church 24 exemption), for religious worship and the operation of a school of less than collegiate grade 25 (religious exemption), or for religious purposes (welfare exemption). The active solar 26 energy exclusion would apply to the system, and it would not be assessable

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