

From: [roland marx](#)
To: [McNamara, Ed](#)
Cc: [Tierney, June](#); [Roisman, Anthony](#); [PUC - Clerk](#); [Rep. Sarah Copeland-Hanzas](#)
Subject: Solar net metering
Date: Friday, December 20, 2019 10:52:39 AM
Attachments: [PSD_net_metering_12.19.2019.pdf](#)

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Good morning Mr McNamara:

Attached and below is a letter addressing proposed changes in solar net metering regulations relating to:

- (1) how monthly netting out metered credits would be limiting, and
- (2) how to meet tier II requirements by modifying rule 5.100 so as to achieve RES standards, and protect utilities' retail sales revenues, and encourage local Vermont community net-metered solar generation.

This is a time to grow local clean solar, not curb it. Greta Thunberg put it this way at the UN general assembly, "we are in the beginning of a mass extinction, and all you can talk about is money and fairy tales of eternal economic growth".

Thanks for your consideration.

Roland Marx
Boardman Hill Solar Farm

<https://us7-broadcast.officeapps.live.com/m/Broadcast.aspx?Fi=a62981ba03f65303%5F1d1b31ec%2D2449%2D4ef8%2D83e4%2D64663de3815d%2Edocx>

Boardman Hill Solar Farm
341 Tiffany Road
Belmont, VT 05730

Ed McNamara, Director
Regulated Utility Planning Division
Vermont Public Service Department

by email to ed.mcnamara@vermont.gov December 19, 2019

re: solar net-metering

Dear Mr McNamara:

This addresses proposed changes in net metering regulations.

1. Monthly netting out metered credits is limiting

We understand your department proposes changing netting out solar generation credits and energy consumption from an annual to a monthly basis. This would be limiting and punitive to panel owners in our local community solar farm, and others like it.

Shifting from annual to monthly net credit doesn't account for the seasonal variation in solar generation and energy consumption. Both are seasonal, but generation peaks in the summer and residential electricity use peaks in the winter. At Boardman Hill Solar Farm, the sunny months of March-October account for 85% of mean annual kWh production, but residential electric use in these months is only about 50% of annual use. In the November-February winter months, generation is only 15%, but usage is almost 50% (even higher with heat pumps).

Given this seasonal difference, your proposal would create a significant hardship, with the loss of credits from about 35% of energy generation, and the inability to offset about the same share of annual electricity costs. That's harshly restrictive. And this would discourage in-state local community solar development, the very kind of renewable energy generation that is needed.

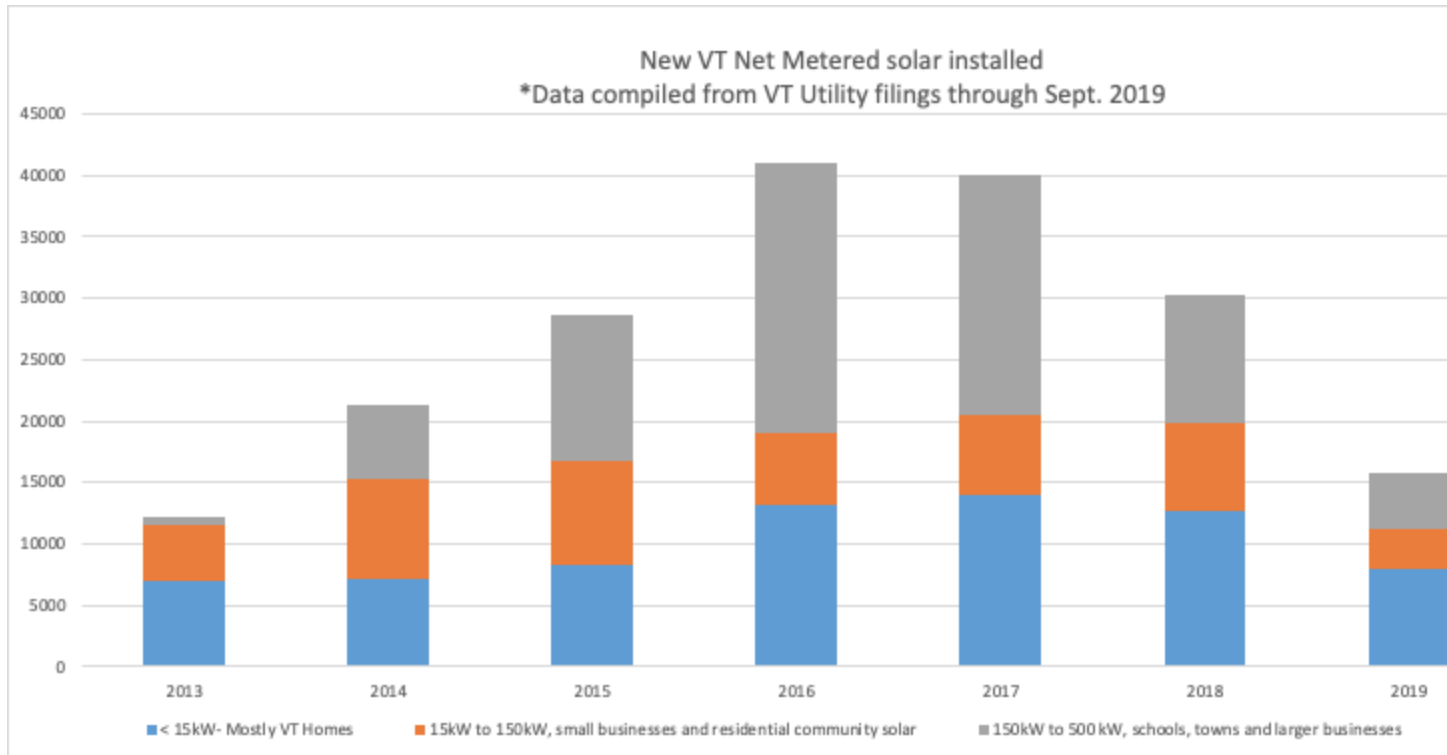
2. How to meet tier II requirements

We are aware of the PSD's reports of exponential growth of net-metering in Vermont in recent years, and in the PSD's belief that solar has become a mature industry, no longer needing incentives. We know too of GMP's out-sized elaborations of solar growth and expansion in GMP territory. While there is basis for solar progress, there's more to it than that.

It's obvious there are many solar panels on our landscape. But appearances can be deceiving. Those panels may have the capacity for solar generation, and may even have produced solar energy. But virtually all that solar energy has been exported. It's been sold out of state to satisfy requirements in MA or CT. There is no more solar in Vermont.

You know GMP has reported its energy portfolio as being 0% solar for the past 3 years, 2016-2018. GMP's energy sources included as much as 25% solar and other renewables in 2017, but all solar and other "high value RECs" were sold to out of state buyers, and GMP satisfied RES tier I requirements by buying "low value RECs" from hydro Quebec. 0% solar for 3 years is not growth.

You know too that after state regulators changed solar net-metering compensation in July 2017, solar development reversed course sharply downward, and new net-metered solar installations have plummeted down more than 50% since then:



This is not a picture of a mature and expanding solar market. Rather, it illustrates a solar market that has been greatly influenced by Act 56, which directed the PUC to implement a renewable energy standard as of 2017.

We are surprised the PSD didn't report the above to Vermont legislators in their 2019 biennial report on renewable energy programs. Instead, the PSD related the negative implications to utilities' retail sales revenues of PUC rule 5.100, which provides for net-metering customers to receive a premium of 6 cents per kWh for transferring RECs to the host utility to satisfy tier II requirements. It was said that utilities would be able to obtain the same product (energy and RECs) at a lower cost than from net metered solar generation.

This gives the impression that utilities' profits come before the renewable energy standards and the development of local Vermont community net-metered solar generation that satisfies tier II requirements. This also suggests the PSD should propose a change to the PUC rule that offers a premium for transferring RECs to utilities.

We at Boardman Hill Solar Farm agree with eliminating the reward for transferring RECs to a host utility, and for encouraging local community net-metering projects like BHSF to hold and retire RECs, accredited by a third-party authority so as to satisfy tier II RES requirements. Let utilities secure RECs that meet tier II standards at lower cost if they can. And encourage in-state solar generation that retires RECs and meets tier II standards with proper compensation, perhaps +3 cents more than now.

Thanks for your consideration.

Cordially,

Roland Marx
Boardman Hill Solar Farm
VGVG - Vermont Grown & Vermont Green ... we retire RECs

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