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TO: MS. HOLLY R. ANDERSON, VERMONT PUBLIC UTILITY COMMISSSION
FROM: KATHY BEYER/SVP REAL ESTATE DEVELOPMENT
SUBJECT: NET METERED SOLAR FOR AFFORDABLE MULTIFAMILY HOUSING
DATE: JUNE 24, 2022

Thank you for the opportunity to comment on the proposed changes to Rule 5.100.

Evernorth is a nonprofit affordable housing developer working in Vermont, New Hampshire and Maine. We have developed over 6,000 units of affordable rental housing across the state of Vermont during our 34 year history. In our current portfolio of housing, we are co-owners of over 3,500 apartments across the state. We have been a leader in building energy efficient apartments and in incorporating renewables into your buildings.

During 2015-2016, Evernorth developed two net metered systems: HVT Solar in Ferrisburgh, net metered to 311 affordable apartments in GMP's service territory, and Round Barn Solar in Grand Isle net metered to 79 affordable apartments in VEC territory. We have also signed several net metering agreements for our properties with private solar companies.

Our rental housing serves a much lower income population than the homeownership population; of the 6,600 residents living in our 3,500 apartments, 89% of these residents have incomes below 60% of median income.

Yet the benefits of solar seem to be targeted to the higher income, homeownership households. The net metering program is the only incentive available that can benefit affordable rental housing, yet the changes to Rule 5.100 will continue to make it more difficult to get these benefits to our low and moderate income renters.

These changes are happening at a time that when state energy policy is also driving Evernorth and our nonprofit partners to electrify our buildings with heat pumps. In natural gas territory, the heating costs for an electric building are 30% higher than a traditional natural gas system. If we are being asked to electrify our buildings for climate change reasons, during what is also a time of a housing crisis, these buildings must be paired with solar.

For a single family home, the solution is straight forward: panels on the roof can often offset most of the electric costs. For a multifamily building, that is not the case for a simple reason: there is not enough roof space for the panels. The roof of a multifamily building is often populated with the condensers for the heat pumps, and ERV equipment. To offset the load of a multifamily building, there must be an off-site alternative. A net metered system may be the only avenue available for off-site solar.

We ask the Public Utility Commission to reconsider the changes to Rule 5.100 that reduce the viability of larger systems for this reason. We also advocate for adding to the definition of “Preferred Sites” to allow 500kW or larger systems that are net metered to affordable rental housing will be considered a preferred site.

Connecting the benefits of solar power to low and moderate income Vermonters has proven to be elusive. The proposed changes to Rule 5.100 may further erode that policy goal.