



Empowering Communities, Advocating Solutions.

**Testimony to the CGA Energy and Technology Committee
Testimony by Louis W. Burch
Citizens Campaign for the Environment**

**March 1, 2016
Hartford, CT**

Senator Doyle, Representative Reed, distinguished members of the CGA Energy and Technology Committee, thank you for the opportunity to submit testimony on this important issue.

My name is Louis Burch and I represent Citizens Campaign for the Environment (CCE). Supported by over 80,000 members in Connecticut and New York State, CCE works to empower communities and advocate solutions that protect public health and the natural environment. We would like to offer the following testimony in opposition to HB 5427:

Shared solar (also known as *community solar*) is an important part of Connecticut's renewable energy strategy, because it allows energy consumers to reap the benefits of clean, renewable energy, regardless of whether they themselves are able to install solar photovoltaic (PV) systems on their property. This is critical for property owners in the state who have one or more limiting factors that render them ineligible for most solar installations (e.g., the property does not belong to the customer or does not receive enough sunlight, etc.). By allowing energy customers to buy into shared solar facilities, Connecticut will be able to significantly expand access to clean solar energy while working towards meeting our RPS goals and providing improved stability and energy independence in our state. Unfortunately, the program is months behind schedule and Connecticut residents are without a robust shared solar program to this day.

PA 15-113 required the Dept. of Energy and Environmental Protection (DEEP) to issue a request for shared energy proposals no later than July 1, 2016. To date, DEEP has not met this requirement, and instead submitted a petition to the Public Utilities Regulatory Authority (PURA) to clarify certain provisions of the law. HB 5427 was intended to address some of these issues, but it would further delay implementation of Connecticut's pilot program by extending the deadline for RFPs by six months. We feel this is counterproductive as DEEP could easily learn from the experience of the 15 other states that have already implemented their own shared solar programs. This legislation would simply prolong the process even further, leaving investors with no choice but to look to other states where incentives for shared solar are available and far more attractive to utilities than our own.

Many in the solar industry have also complained that the shared solar program enacted in PA 15-113 was too small to begin with, and that the legislature has not provided sufficient incentives needed to meet the actual demand for clean solar in Connecticut. The law allowed for the construction of up to 6 megawatts of shared energy capacity, which does not even come close to meeting the growing demand for clean solar power in our state. In March of 2015, the Connecticut Academy of Science and Engineering (CASE) issued a report which concluded that uncertainty created by limiting the shared solar program to a pilot would inhibit project development and investment in Connecticut¹. Instead of reworking or clarifying provisions from the existing law, the Energy & Technology committee should work to initiate a full scale shared solar program with robust financing and incentives as soon as possible.

Finally, the financing mechanisms laid out in HB 5427 are too short term to make this program workable in the real world. Under the law, financing options for energy companies would only be available for a term not to exceed fifteen years, while the useful life of most solar PV systems is closer to 25-30 years. Additionally, utilities would be free to recoup leftover costs by adjusting electric rates at their own discretion. This could potentially leave ratepayers vulnerable to unpredictable rate increases, effectively negating the cost benefits of shared solar.

In conclusion, CCE is opposed to HB 5427, but supports the concept of a shared solar program for Connecticut and welcomes changes to the original law that would expand or expedite the current process. Shared solar can help provide extensive benefits to energy consumers across our state, and the program should not be delayed or limited due to the agency's inability to meet requirements in a timely fashion. CCE respectfully urges this committee to reject this proposal and to expedite a full-scale shared solar program with no limits on project scale or capacity.

Thank you for the opportunity to submit testimony and we look forward to working with this committee and involved stakeholders on this important energy issue.

¹ Connecticut Academy of Science and Engineering, *Shared Clean Energy Facilities* (Mar. 2015)