

SB 394: AAC Virtual Net Metering and Certain Zero or Low Emission Generation Projects.

Greenskies Renewable Energy is a Connecticut-based solar development company headquartered in Middletown and proud to be the largest privately held C&I solar developer in the United States. In the commercial sphere, Greenskies is the preferred developer for both Target Corporation and Walmart, and in the municipal sphere we are currently working with over 30 municipalities in Connecticut alone.

We are here before you today to discuss options for expanding the VNM cap that will allow for additional municipal VNM developments to proceed while simultaneously providing our municipalities with some much needed capital during these difficult financial times. When the VNM program was created, the legislation was very clear. There would be three funding categories of Municipal, State and Agricultural, and the program in its entirety would be capped at \$10 million, and no single category would account for more than 40% of the \$10 million cap.

What needs to be made very clear from the onset is that there is NO QUEUE for the Municipal Virtual Net Metering, and there are no “stranded municipalities”. The program cap was met very early on in 2014 and this fact was known by solar developers and municipalities alike. **What we are discussing here today is a new program for Municipal VNM,** but this change must be instituted thoughtfully. Simply shifting funds from the State and/or Agricultural silos to the Municipal silo would only allow a handful of companies to participate. These are companies that continued to submit projects knowing full well that the cap had been met with the intention of coming before you today to ask that the rules be changed with the “queue” left intact.

Greenskies currently has ZREC’s secured for landfill VNM projects in Southington, Middletown, Clinton and Milford to name a few. Upon the Municipal VNM cap being met, Greenskies immediately and responsibly sought alternative avenues to offload the power generated within the current regulatory environment whether that be submitting these sites into the Shared Solar PILOT program or to qualify these facilities as Load Reducers under FERC and selling the power at the LMP price.

GREENSKIES RESPECTFULLY REQUESTS THAT THE LEGISLATURE TAKE ACTION BY IMPLEMENTING ONE OF THE FOLLOWING:

1: Lift the VNM cap here in CT similar to what has been done in New York State. Like New York the VNM ceiling would float upward to accommodate all new applications until PURA and the Legislature can develop a permanent and more workable solution. This would allow municipal VNM projects on landfills and brownfields throughout the state to commence immediately, thereby freeing up some much needed capital for Connecticut’s cash strapped towns and cities.

2: Institute a new submission deadline of September 1, 2016 and require that all eligible projects be submitted into a random selection process, similar to the procedures in place for the Small ZREC Program as overseen by the Office of Consumer Council. Projects would be randomly selected and given a number in the queue. We believe this is a fair system that will provide an equal playing field for every project and every municipality.

Thank you for considering this proposal and we welcome any opportunity to discuss this further.

Best Regards,

Michael Silvestrini, President, Greenskies Renewable Energy – Mike@Greenskies.com / (860-598-3408)