



**COMMENTS OF THE COALITION FOR COMMUNITY SOLAR ACCESS
ON S.B.9, AN ACT CONCERNING CONNECTICUT'S ENERGY FUTURE
ENERGY & TECHNOLOGY COMMITTEE
March 1, 2018**

Dear Members of the Energy & Technology Committee:

Thank you for the opportunity to submit these comments regarding Senate Bill 9, *An Act Concerning Connecticut's Energy Future*.

The Coalition for Community Solar Access (CCSA) is grateful for recent discussions with members of this Committee about introducing a second bill (Raised Bill 336) we feel will more effectively attract new investments, create jobs and reduce emissions through a statewide community solar program. A framework along the lines of Raised Bill 336 will correct some significant flaws in the Shared Clean Energy Facility (SCEF) provisions in SB 9, and we look forward to a hearing on Raised Bill 336 at a later date.

At this time, CCSA would oppose Sections 4 and 5 of SB 9, based on our belief – and drawing from the lessons learned in other states – that it will not create a viable community solar program in Connecticut.

CCSA is the national business-led trade organization that works to expand access to clean, local affordable energy through community solar. Our mission is to empower energy consumers, including renters, homeowners, and households of all socio-economic levels, by increasing their access to affordable, reliable clean energy. Our members have been involved in community solar legislation and implementation in all 16 states with community solar programs, and we're excited to be present these best practices to the Committee.

CCSA member companies have been actively engaged in the discussion around community solar in Connecticut for a number of years. We are grateful that the Department of Energy and Environmental Protection included a proposal for an expanded SCEF program in its 2018 Comprehensive Energy Strategy, which informed the text of SB 9.

However, the basic framework of SB 9 contains a number of significant flaws that will not create the viable, successful SCEF program that members of this Committee have sought for years:

#1: Establishing a tariff is the correct approach for the long-term. But first, the community solar industry must be able to launch with a simpler credit rate that can be implemented now.



growth in Connecticut's solar employment compared with 2016.¹ A well-constructed community solar program will brighten the outlook by attracting investments and creating new jobs; a recent report by Vote Solar concludes that a 200-megawatt community solar program could add 2,580 full-time jobs in Connecticut, while generating new property taxes for cash-strapped municipalities.² A 300-megawatt program (such as in Raised Bill 336) would generate even greater employment.

#3: SB 9 will prolong the existing inequity of the solar energy market by making it very challenging for renters, those with smaller and historic homes, as well as low-income residents to switch to clean energy.

At least 75 percent of Connecticut customers do not qualify for traditional rooftop solar because they don't own their homes, or their roofs are too small or shaded by trees or neighboring buildings. Community solar promises to finally open access to these customers, especially low- and moderate income residents for whom bill savings are especially critical.

SB 9's proposed annual procurement cap – under which all kinds of distributed generation would compete – would keep solar access out of reach for the overwhelming majority of Connecticut households and businesses for years.

In place of S.B.9's SCEF provisions, CCSA urges the Committee to enshrine the best practices seen in other states and adopt a robust community solar program this session to finally unlock the power of clean, local energy:

- Connecticut should establish a 300-megawatt community solar program – the same size as the Connecticut Green Bank's Residential Solar Incentive Program (RSIP).
- To attract new jobs and investment and allow the program to ramp up quickly, the program should initially rely on the current retail rate net metering structure used for rooftop solar, and then transition to a sustainable value-based credit structure that will reduce costs for the long term.
- While annual procurements may help get solar *assets* built, building a homegrown solar *industry* requires a statewide program that does not rely on annual deadlines and caps. An "always-on" program with clear rules and predictable compensation rates will help Connecticut fully achieve the employment and economic benefits of a robust community solar industry.
- The bill should have a special focus on low- and moderate-income customers by setting a goal for their participation at no less than 20 percent - which, if passed into law, would be one of the more robust low-income community solar programs in the nation. The Connecticut Green Bank

¹ <http://www.thesolarfoundation.org/wp-content/uploads/2018/02/Solar-Jobs-By-State-1.pdf>

² <https://votesolar.org/usa/connecticut/updates/jobs/>