



**The Energy and Technology Committee**

**Public Hearing, March 6, 2018**

**Office of Consumer Counsel**

**Elin Swanson Katz, Consumer Counsel**

Testimony of Elin Swanson Katz

**Raised Bill No. 336**

***An Act Concerning Community Shared Solar***

**Raised Bill No. 5050**

***An Act Concerning Shared Solar Facilities and Municipal Airports***

The Office of Consumer Counsel (OCC) has reviewed both of these bills that seek to promote community shared solar. OCC has some positive comments and some concerns to raise about each bill.

In general, community solar projects can be a positive development. OCC is aware of some successes with community solar projects in a small number of states, including Minnesota, California, and Massachusetts. Community solar projects allow participation, through subscription, by a broader share of citizens in renewable energy, including citizens whose homes or businesses are not a candidate for rooftop solar due to the roof, tree cover, or lack of sufficient financial resources.

Ideally, community solar projects should create at least some economies of scale, as the facilities can be built in relatively large scale, and then the output assigned to a variety of subscribers. Community solar facilities should not be expected to be as inexpensive as pure grid-side projects, since community solar projects are generally not as large and have additional expenses and risks for attracting and servicing subscribers, but, in OCC's view, they should be expected to be less expensive than rooftop solar. Two truths are paramount: (1) clean energy is important; and (2)

ratepayer funds are limited. There are viable grid-side and rooftop solar projects remaining in this state. Where community solar projects are *more* expensive than rooftop projects despite the economies of scale, the case for supporting community solar essentially evaporates. As OCC stated in its testimony as to Governor's Bill No. 9, being pro-clean energy requires getting the maximum clean energy for each dollar expended.

Governor's Bill No. 9 and the Department of Energy and Environmental Protection's (DEEP) Comprehensive Energy Strategy (CES) already support the development of additional community solar projects, but the support is conditional and limited. If the General Assembly and this Committee is interested in moving more rapidly on this subject, OCC is prepared to provide assistance and has been studying the community solar efforts in other states. OCC notes that the bills under consideration today contain many of the design elements that one would want to see in a community solar program, including provisions for low-income participation, provisions to ensure a diverse set of subscribers from all rate classes (including those who receive their non-solar kilowatt-hours from a competitive suppliers), and consumer protection provisions. On the other hand, we are concerned that the scale of R. B. 336 seems quite large at "*not less* than three hundred megawatts," with no upper limit, and it would inappropriately in our view allow for the use of energy efficiency funds and not just renewable incentives. The large and potentially unlimited scale of the bill will not foster competition among projects for what ought to be a finite and defined set of resources supporting community solar, which OCC views as essential to success. This shortcoming is also one of the concerns we have with R.B. 5050, which seems targeted to Tweed Airport rather than requiring that a project at Tweed compete with other projects in a selection process.

OCC also notes that the Public Utilities Regulatory Authority needs to play a central role and ought to have a proceeding to address and review such a major expenditure of ratepayer funds and utility resources and efforts. At present, R.B. 336 refers solely to DEEP and the Green Bank.

OCC looks forward to continuing to work with this Committee, DEEP, PURA, the Green Bank, and other stakeholders to ensure that Connecticut follows the most successful, appropriate, and customer-friendly models for community solar development.