Legislative Testimony of Vivint Solar, Inc.

To the Joint Committee on ENERGY AND TECHNOLOGY

September 8th, 2020

In SUPPORT of LCO No. 3920 – An Act Concerning Emergency Response by Electric Distribution Companies and Revising the Regulation of Other Public Utilities

Senator Needleman, Representative Arconti, Senator Formica, Representative Ferraro, and members of the Joint Committee on Energy and Technology:

Vivint Solar appreciates the opportunity to provide testimony supporting LCO No. 3920. We are broadly supportive of the provisions in the current bill such as the revisions to the microgrid grant and loan pilot program for critical facilities and implementing performance-based ratemaking for the electric distribution companies. However, the bill as drafted is missing a key component of a more resilient grid: customer-sited solar and energy storage systems. To support this critical resilience technology, we propose the following: 1) include the energy storage language from HB 5351 and 2) as both a resilience and economic recovery measure, extend the Residential Solar Investment Program by 100 MW.

Include HB 5351 Energy Storage Language in LCO No. 3920

The damage inflicted by Tropical Storm Isaias and the subsequent power outages highlighted an ongoing concern regarding the electric distribution system and its resilience in the face of a changing climate. Prolonged power outages in many parts of the state caused significant emotional and financial distress for residents – all amidst the ongoing challenge of a pandemic.

Changes to regulatory structures or mandates to the electric distribution companies (“EDCs”) alone will not be able to prevent power outages from occurring. As long as there is an electric distribution system able to be damaged, there will be power outages for ratepayers. Burying distribution lines has been described in prior public hearings as cost prohibitive and improved vegetation management will only go so far when major storms hit. The optimal response to severe weather is to never lose power in the first place – which can only be provided by on-site energy storage. Where the EDCs and existing electric grid have fallen short in providing adequate resilience, ratepayers should have more options to take matters into their own hands rather than continuing to rely solely on the EDC and hoping that next time it will be different.

Solar paired with energy storage provides ratepayers the ability to power through outages using safe, clean, quiet, renewable energy. Regardless of whether the system is providing whole-home or partial-home backup, it provides peace of mind and allows communities to rebound faster and with less financial damage. There are numerous cases of homeowners, businesses, and critical facilities that have been able to withstand power outages for days with their solar plus energy storage systems, including cases from neighboring states during this recent tropical storm.¹ Conversely, after many storms there

¹Examples include:
California - https://www.greentechmedia.com/articles/read/vivint-introduces-storage-ppa-in-california-citing-
are tragic stories of deaths due to improper use of fossil fuel generators.² Widespread energy storage deployment would also allow the EDCs to be more targeted in their restoration efforts on those customers who need it most. The aftermath of Tropical Storm Isaias has made it very clear that Connecticut needs to quickly encourage the deployment of energy storage across all segments of ratepayers.

Prior to Covid-19 prematurely ending the legislative session, the Energy and Technology committee was considering HB 5351 which would have been an important first step towards a cleaner and more resilient electric grid by setting a state energy storage target and requiring PURA to develop programs to meet that target – specifically energy storage programs for residential and commercial customers. We ask that the language from HB 5351 be included in the final version of this bill.

All options should be on the table to improve storm response and resilience in the state and that includes on-site energy storage. The bill already makes some changes to allow for energy storage at critical facilities for resilience purposes, but a comprehensive approach to grid resilience should also include encouraging energy storage for residential and commercial customers. To those customers, their home or business is a critical facility.

**Extend the Residential Solar Investment Program by 100 MW**

Achieving widespread deployment of solar plus energy storage systems requires a healthy solar industry. Covid-19 has had a significant impact on the industry both in terms of the number of installations and the clean energy jobs associated with those installations. Vivint Solar’s Connecticut workforce has contracted by 20% since March – a situation which is likely similar to many other solar companies in the state. Installations have still not rebounded back to pre-Covid levels and, given the ongoing economic impact of the pandemic, may not achieve pre-Covid levels for some time.

While resilience and storm response are in the spotlight, and rightfully so, the economic impact of the pandemic on the solar industry is very real and should also be addressed. We ask that an extension of the Residential Solar Investment Program (“RSIP”) be included in the legislation. Without an extension, the program will be full by the end of October which is why this issue cannot wait until the 2021 legislative session. Given the urgency of addressing climate change and the need for Connecticut to increase solar deployment to meet its 2040 zero-carbon electricity goals, now is not the time to pull back on support for renewable energy.

Clean energy development should be a significant part of a post-Covid economic recovery. The solar industry was already navigating a reduction in the federal investment tax credit and a step-down in the RSIP incentive value in early 2020 when Covid-19 swept the nation leaving the industry reeling. If RSIP

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² At least 8 deaths in Louisiana from Hurricane Laura are due to improper generator usage:  
expires in October and the ITC once again declines in January 2021, the combination of all those impacts would be significant and solar jobs will be lost as a result.

Extending the RSIP program requires no budget allocation due to the structure of the program and is an existing economic recovery measure that can simply be extended. In fact, due to the requirement that participants in RSIP receive a home energy audit, the program supports both solar and energy efficiency jobs in Connecticut. Solar customers also typically save money on their monthly utility bills which can then be used in other sectors of the economy. Extending the RSIP program provides many benefits with virtually no cost.

**Conclusion**

Not losing power at all is the best form of storm response. The technology already exists for ratepayers to have on-site generation and energy storage without the need for dirty, dangerous fossil fuel generators. Facilitating the growth of distributed energy storage is a critical piece of a 21st century electric grid that is more resilient to natural disasters and better serves ratepayers. Focusing this bill entirely on the EDCs while leaving out solar plus energy storage leaves storm response solely in the hands of the entities that have failed customers storm after storm.

Sincerely,

Kyle Wallace
Sr. Manager of Public Policy

About Vivint Solar

*Vivint Solar is one of the largest residential solar and energy storage providers in North America, with headquarters in Utah and operations in 22 states across the country including an operations center in North Haven, Connecticut. Vivint Solar has over 200,000 customers nationwide and over 3,300 customers in Connecticut. Vivint Solar began operations in Connecticut in 2015 and has approximately 80 employees in the state. Vivint Solar provides solar, energy storage, EV chargers, and other related home energy upgrades.*