

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC)
CO.D/B/A NATIONAL GRID'S TARIFF)
ADVICE NET METERING PROVISION)
RIPUC NO. 2207 (FILED 1/26/18))

Docket 4790

**THE COALITION FOR COMMUNITY SOLAR ACCESS
POSITION STATEMENT**

The Coalition for Community Solar Access (“CCSA”) respectfully asks National Grid and the Commission to approve tariff language that allows community remote net metering projects a one-year extension on the cap allocation operation deadline or more time for performance if confronted with specified project implementation delays beyond the developer’s control.

CCSA appreciates the opportunity to comment on National Grid’s proposed amendments to the net metering tariff issued on January 26, 2018. CCSA is a business-led trade organization comprised of over 40 member companies that works to expand access to clean, local, affordable energy nationwide through community solar. CCSA’s mission is to empower energy consumers, including renters, homeowners, businesses and households of all socio-economic levels, by increasing their access to affordable, reliable clean energy. CCSA, in partnership with a thriving network of non-profits, affiliate trade associations, and allied stakeholders, serves as the central voice for the community solar industry in developing vibrant and sustainable markets for community solar. CCSA members are active nationwide and our members have been actively engaged in Rhode Island policy with the hopes of providing a solid foundation for the community distributed generation (“CDG”) market. Our position on this tariff is based on CCSA members’ extensive experience working around the country and here in Rhode Island.

It is difficult to overstate the importance of community solar in a state's energy economy. Residents and businesses that may not be well situated to access solar themselves are now able to participate in Rhode Island's clean energy economy, bringing critically important new investment and other benefits to the state. Companies have made millions of dollars of strategic investments and hired employees for community renewables in other states and CCSA is eager to grow those and other benefits for Rhode Island.

CCSA proposes one discreet amendment related to the administration of community remote net metering in Rhode Island, as set forth by redlined text in Exhibit A on sheets 7 and 8. The community remote net metering program is currently capped at a total program of thirty megawatts. Program caps result in an unfortunate administrative need to manage competing claims to eligibility for "cap allocations." CCSA was directly involved in the development of the community net metering section in the net metering tariff. It provided input on the cap allocation requirements, including the mandate that projects must be operating within twenty-four months of program allocation or will forfeit their eligibility. It has since been brought to CCSA's attention that inflexible project development deadlines that do not account for delays beyond the control of the project developer inhibit access to financing. Deadline extensions are common features of other community solar programs in the country including Maryland, New York, Colorado, Oregon and Minnesota. The amendment seeks to allow community remote net metering project developers deadline flexibility for one additional year and for specified delays that are beyond their control, including interconnection delays or delays resulting from legal challenges regarding permitting.

This proposed flexibility is consistent with the latitude granted participants in Rhode Island's renewable energy growth program tariff. It is also good public policy. Solar development in Rhode Island is still in its infancy, and interconnection build out delays or delays in permitting and the land

entitlements process are not uncommon. Community remote net metering project developers in Rhode Island simply cannot afford to invest in resolving all development contingencies before applying for a cap allocation. Moreover, net metering customers should get the same administrative flexibility allowed to customers participating in the renewable energy growth program. While it is appropriate to expect them to commit to diligent pursuit of project development and the resolution of contingencies under their control, Rhode Island policy should not expect lenders or investors to accept the prospect of funding risk that is beyond a developer's control. This proposed flexibility in the operation deadline will better equip Rhode Island to meet its goal of developing thirty megawatts of community remote net metering projects.

CCSA has been involved in community solar ratemaking and policy efforts around the country, providing a unique perspective by bringing together a wide range of community solar business types and models. As Rhode Island's community solar policy landscape evolves, CCSA offers the Commission its members' experience and perspectives of how markets are operating in other states and important considerations that should be made to ensure a successful, long-term market. We welcome the opportunity to provide our perspectives on best practices in other states and any other information the Commission might find helpful. Please do not hesitate to contact CCSA for such information; we look forward to more involvement.

In this docket, CCSA respectfully asks the Commission to approve amendment of the net metering tariff to allow community remote net metering projects an additional year for project development where needed, and additional time for interconnection and permitting delays that are

interconnection and permitting delays that are beyond the project developer's control.

**THE COALITION FOR COMMUNITY
SOLAR ACCESS**

By their attorneys,



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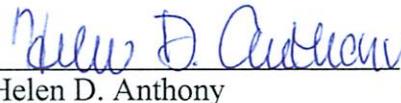
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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2018, I delivered a true copy of the foregoing document to the service list by electronic mail.



Helen D. Anthony

EXHIBIT A
Proposed Amended Tariff Language