



January 26, 2021

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

RE: Petition of Nautilus Solar Energy, LLC for Declaratory Judgment on Rhode Island General Laws §39-26.4, the Net Metering Act

Dear Ms. Massaro,

This letter is being submitted by the Public Housing Association of Rhode Island (“PHARI”) in support of the Petition for Declaratory Judgment filed by Nautilus Solar Energy, LLC (the “Petition”). PHARI is a cooperative of Rhode Island housing authorities formed to share resources, municipal procurement functions, and improve the effectiveness of municipal housing authorities across the State.

As discussed in the Petition, PHARI issued a Request for Proposal (the “RFP”) that Nautilus Solar Energy, LLC (“Nautilus”) responded to. Pursuant to that RFP, Nautilus has proposed entering into Net Metering Financing Arrangements with eleven of the member housing authorities that are part of PHARI.

We are excited about the opportunity to work with Nautilus and begin the process of offsetting the electrical consumption at our properties with new renewable energy systems in the State of Rhode Island. As we are sure you are aware, ensuring access to renewable energy for residents in low and moderate-income housing has been both a challenge and a major priority for a number of RI stakeholders, PHARI included.

We have read the Petition and agree entirely with the arguments presented there. The renewable energy systems being constructed by Nautilus are able to provide enough energy to satisfy the demands of the eleven housing authorities across just three renewable energy systems. If they were instead required to fragment those systems into eleven separate systems we believe the cost to construct those systems (and thus participate in net metering) would be significantly higher and potentially prohibitive.

The participating members of PHARI elected to issue the RFP collectively with the understanding and expectation that multiple housing authorities would be eligible to share renewable energy systems, consistent with how we understand the regulations to be written (and also consistent with the Petition). Our goal in pooling these accounts together was to take advantage of economies of scale (getting a better rate for as many housing authorities as possible) and sharing resources for negotiating and navigating the contracting and approval process. We relied on that interpretation when issuing the RFP and hope that RIPUC confirms that position as well.

The assurance and clarification we seek in the Petition would allow PHARI to move forward on this project and lower barriers for housing authorities so that they can start enjoying the benefits of net metering, which include lower energy costs and a reduced reliance on fossil fuels. Particularly for many of the smaller housing authorities who themselves have limited electrical volume and administrative



resources, this is a matter of access. We see no drawbacks to approving the Petition, and are eager to start enjoying the benefits of Rhode Island's clean energy programs as soon as possible.

Accordingly, we are requesting that the Commission approve the Petition and permit us to enter into the net metering arrangements with Nautilus that they have proposed.

Thank you for your consideration of this letter of support. Please let us know if the Commission has any questions or if we can be of any assistance.

Sincerely,

A handwritten signature in blue ink, which appears to read "Michael S. Lyckland".

Michael S. Lyckland, President
Public Housing Association of Rhode Island (PHARI)

CC: Nautilus Solar Energy, LLC
SourceOne, Inc.