From: Deborah Roe
To: Pura.ExecutiveSecretary
Subject: Comments on Docket 26-08-02 - CT Needs True Community Solar
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To Whom This May Concern,

Comments on Connecticut's Solar Successor Program
A Community Solar Program That Allows Everyone to Participate

Connecticut has made modest progress expanding solar, but we are still asking the wrong question. Too often, our solar policies begin with the assumption that the place where a person lives is also the place where their solar panels should be located.

For many Connecticut residents, that simply does not work.

Some people have shaded properties. Some have roofs facing the wrong direction or roofs that will need replacement. Some live in apartments or condominiums. Some expect to move. Others simply do not want solar panels on their homes.

None of these things should prevent someone from participating meaningfully in Connecticut's clean energy transition.

There is another issue that deserves more attention in a heavily forested state like Connecticut. We should not create incentives for homeowners to cut down healthy, mature trees in order to install solar panels. Trees store carbon, reduce summer temperatures, provide shade that can lower household cooling needs, absorb stormwater and provide critical habitat. As Connecticut experiences hotter summers and more extreme precipitation, those benefits become increasingly valuable.

We should be able to tell a homeowner with a shaded roof: **Keep your trees. You can still go solar.**

That is why I urge PURA, as it considers the future of the Solar Successor Program, to look beyond our current approach to shared clean energy and consider what a true community solar program for Connecticut could accomplish.

Connecticut's Shared Clean Energy Facility program has provided benefits to thousands of customers and has appropriately emphasized participation by lower-income households. But its structure and relatively modest subscriber benefit do not capture the enormous potential of community solar.

Community solar should not simply be a way of providing a small electric-bill credit to certain categories of customers. It should provide Connecticut residents with a genuine alternative to putting solar on their own roofs.

Every Connecticut electric customer should be able to participate.

A renter should be able to participate.

A homeowner surrounded by trees should be able to participate.

A condominium owner should be able to participate.

A family that cannot afford a rooftop system should be able to participate.

A household that could afford rooftop solar but simply does not want panels on its house should be able to participate.

And a Connecticut resident who wants to invest more money in local clean energy should have a meaningful opportunity to do that as well.

Let Communities Build Community Solar

I would encourage Connecticut to consider a model in which municipalities, nonprofits, housing authorities, schools, community organizations, cooperatives and private partners can develop community solar projects that primarily benefit the people in the communities where those projects are located.

Towns have tremendous opportunities that individual homeowners do not.

They have schools, municipal buildings, parking lots, transfer stations, landfills, brownfields and other previously disturbed sites. Communities also contain warehouses, shopping centers and other large buildings with roofs and parking areas that may be much better locations for solar than a shaded residential property.

Connecticut could establish a siting hierarchy that strongly encourages community solar first on rooftops, parking lots and carports, brownfields, landfills and previously disturbed land.

This would allow us to expand solar while protecting forests and directing development toward places where solar makes the most sense.

A town could identify several of these locations and develop them together as a community solar portfolio. Residents could then subscribe to or potentially invest in the resulting solar generation.

Instead of asking, "Can I put solar on my house?" residents could ask, "Where is the best place in my community to produce my share of solar energy?"

That is a much better question.

Make the Financial Benefit Meaningful

Participation must also provide a meaningful financial benefit.

People understand rooftop solar because the proposition is relatively straightforward: make an investment and reduce your electric bill over time.

Community solar should be just as understandable.

A resident should be able to subscribe to a share of a community project and receive a clearly defined portion of its value through his or her electric bill. Connecticut should establish minimum consumer savings requirements so that participation produces real savings rather than a nominal credit.

We should also explore opportunities for actual community ownership.

Residents could potentially invest in community solar in relatively small increments. Municipalities, nonprofits or cooperatives could own projects. Connecticut could provide stronger incentives for projects with significant local or community ownership so that more of the economic value generated over the life of these assets remains in Connecticut.

That is an important distinction. We should not measure the success of solar policy only by megawatts installed. We should also ask **who owns those megawatts and where the economic benefits go.**

Tap Connecticut's Financial Resources

Connecticut is a wealthy state, and I do not believe we are taking full advantage of that resource in our clean energy policies.

There are people in Connecticut who have the means and desire to invest substantially more in the clean energy transition. We should give them productive ways to do so.

Imagine allowing someone to invest in a community solar project and designate a portion of the resulting benefits to another household.

A resident might purchase enough community solar to offset his or her own electricity use and then purchase additional shares that benefit lower-income families in the same town.

A business might sponsor solar shares for 50 local households.

A foundation might invest in a community solar project and dedicate the resulting revenue to reducing energy burdens for residents for the life of the project.

An individual might leave community solar shares to a town, nonprofit or community organization as part of an estate.

Instead of continually raising money to help families pay increasingly unaffordable electric bills, we could build clean-energy assets that generate value for those families year after year.

This would allow private capital and philanthropy to supplement—not replace—our commitment to energy affordability.

Local First, But Not Local Only

Community solar should also actually have a connection to a community.

I would suggest giving residents, businesses and institutions in the host municipality the first opportunity to participate in a project. Remaining capacity could then become available to neighboring communities and ultimately customers elsewhere in the utility territory.

This would give communities a tangible reason to welcome appropriately sited solar projects.

If a town hosts a project, its residents should be able to see and experience the benefits.

At the same time, we should avoid rules so restrictive that projects cannot attract enough subscribers to obtain financing.

Make Participation Simple and Portable

Participation should be easy.

Customers should not have to navigate complicated contracts, multiple bills or confusing arrangements with electricity suppliers.

The utility already has the relationship with the customer. Community solar credits should appear directly on the customer's existing electric bill.

And participation should be portable.

If someone moves from Hartford to West Hartford, or from a house to an apartment, that person should not lose the benefits of participating in community solar simply because the meter number changed.

One of the great advantages of community solar should be that the solar investment follows the person rather than the roof.

Use Solar and Storage to Strengthen Communities and the Grid

Connecticut should also consider how community solar can work together with energy storage.

A solar project at a school, senior center, library, fire station or other public facility could include battery storage. During normal conditions, that storage could help reduce peak demand and provide grid services. During an extended outage, appropriately designed systems could help provide community resilience.

This is particularly important as Connecticut prepares for increasing extreme heat and severe weather.

Again, the objective should be larger than simply installing another megawatt of solar. We should ask what additional value that megawatt can provide to the community and the electric system.

A Different Vision for Distributed Energy

PURA has an opportunity through this proceeding to help move Connecticut toward a broader vision of distributed energy.

Utilities have an essential role in maintaining the distribution system, safely interconnecting projects, metering electricity and applying bill credits. But utilities do not need to own every distributed energy resource or control every relationship between a community and its energy resources.

Connecticut should make it easier for municipalities, residents, nonprofits, businesses and community organizations to become active participants in building the state's energy system.

Some elements of a broader community solar program may require statutory changes. If PURA determines that it does not currently have authority to implement particular components, I encourage the Authority to identify those limitations clearly and recommend the statutory changes necessary to the General Assembly.

The Solar Successor proceeding should not only determine the compensation rate for the next increment of distributed solar. It should help answer a larger question:

What do we want Connecticut's distributed energy system to look like ten or twenty years from now?

I hope the answer is not a system in which solar remains largely divided between people fortunate enough to have the right roof and large commercial projects owned by investors.

We can create something better.

We can build a system where a resident can keep the mature trees shading her house and still go solar.

Where a renter can participate as easily as a homeowner.

Where towns can develop solar projects that directly benefit their residents.

Where families can invest in clean energy without putting equipment on their homes.

Where people with greater financial resources can help purchase clean-energy assets that reduce energy burdens for their neighbors.

Where schools, parking lots, landfills, brownfields and commercial rooftops become productive community energy resources.

Where storage paired with community solar strengthens both the grid and the communities it serves.

And where the wealth created by Connecticut's transition to clean energy remains, to a much greater extent, in Connecticut communities.

Everyone should have the opportunity to participate in Connecticut's clean energy future.

Our solar policies should make that possible.

Sincerely,

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