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Fwd: Comment for docket CEPR-IN-2017-0002 and request for new rulemaking

1 message

María del Mar Cintrón Alvarado <mcintron@energia.pr.gov>
To: Zugeily Colón Del Valle <zcolon@energia.pr.gov>

Thu, Dec 7, 2017 at 10:25 AM

fwd

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From: <joy@solargardens.org>
Date: Wed, Dec 6, 2017 at 8:53 PM
Subject: Comment for docket CEPR-IN-2017-0002 and request for new rulemaking
To: comentarios@energia.pr.gov

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December 6, 2017

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Honored Commissioners,

Please consider this letter to be:

A comment under the currently open docket CEPR-IN-2017-0002 "ENERGY COMMISSION INVESTIGATION REGARDING THE STATE OF THE PUERTO RICO ELECTRIC SYSTEM AFTER THE PASSING OF HURRICANE MARÍA", if this docket is still accepting comments.

A request that an expedited rule making be commenced for community renewables (also referred to as "shared renewables" or "solar gardens") under A-133-2016

Community solar offers an opportunity for electricity customers, including those with low to moderate incomes, to own shares of solar energy farms close to their residence or place of business. This model for distributed energy development has been implemented successfully in several states including Washington, Colorado, and Minnesota, and new programs are beginning implementation in the District of Columbia, Maryland, New York, and Hawaii.

I am the Executive Director of the Solar Gardens Institute (SGI). SGI (solargardens.org) is a Colorado nonprofit providing assistance in policy development, education, and early stage project development. SGI is a member of the National Community Solar Partnership established in 2015 by the White House and Department of Energy SunShot initiative, focusing on community solar for low and moderate income individuals.

SGI is preparing a series of seminars and a one-semester bilingual course to train community leaders throughout Puerto Rico to develop shared renewable projects in their own communities. I also serve as an advisor to the nonprofit Energy Relief, and will likely travel to Puerto Rico in January to teach seminars in person and hire a

bilingual teaching assistant.

In Puerto Rico, shared renewable energy systems can be developed with a goal of developing a more resilient and cost-effective energy system in the wake of Hurricanes Irma and Maria. An increase in renewable penetration will also reduce the vulnerability of Puerto Rico's electricity rates to potential future oil price shocks. An expedited implementation process could allow the first projects to begin operation within 12 months.

A-133-2016 includes the following language:

Section 9.- Section 3.4 of Act No. 57-2014, as amended, is hereby amended to read as follows:

"Section 3.4.- Duties and Powers of CEPPO....(ii) To formulate strategies and make recommendations to the Energy

Commission to improve the electric power service in low-income communities through the study, promotion, and development of Community Solar Projects, using as guidelines the recommendations made by organizations such as IREC and NREL, adapted to Puerto Rico, and seeking the input of PREPA and the representatives of community organizations as well as relevant professional, and academic organizations.

SGI makes the following recommendations:

An expedited CEPPO / EC rule making should be commenced as soon as practicable with the goal of rapid implementation of community shared renewables. The Solar Gardens Institute can assist in policy development.

Rules can be based on the Interstate Renewable Energy Commission (IREC) "Model Rules for Shared Renewable Energy Programs" and "Shared Renewable Energy for Low-to Moderate-Income Consumers: Policy Guidelines and Model Provisions" available for download at <http://www.irecusa.org/regulatory-reform/shared-renewables/>. As a model, statutes in Maryland and the District of Columbia are based on the IREC guidelines and provide the most advanced and well-researched policy provisions available.

Multiple developers will be able to build projects. We recommend not using an exclusive vendor relationship. PREPA can use a standard offer and queuing model during the current crisis with sufficient production based payments to assure projects are economically viable. In the long term, a competitive bid process can assure projects can be implemented at the lowest possible cost.

No hard limit is recommended on the number or total capacity of shared renewables projects, in order to maximize the amount of solar that can be installed. Hawaii's experience can be used to understand how much solar the grid can handle.

An expedited interconnection process is recommended for community shared renewable projects in place of Rule 8915 for at least two years.

Non-solar renewables such as wind and small hydroelectric can be included in the program. Community ownership models can also work for integrated technologies such as microgrids.

Installation of solar gardens can proceed in impacted areas even before full grid service is restored. These arrays can serve microgrids, which can be connected to the PREPA grid when feasible.

The cooperative business model should be encouraged

We recommend the legislative assembly exempt community renewable subscriptions from securities registration, limited to a size to meet 120% of subscriber's demand.

Subscriptions from low and moderate income (LMI) individuals should make up at least 20% of Puerto Rico's shared renewable capacity. Strategies and business models to encourage LMI participation are being investigated by SunShot's National Community Solar Challenge.

Thank you for your time and consideration. Please contact me at the Solar Gardens Institute if you have any questions or need assistance.

Sincerely,
Joy Hughes
Executive Director
Solar Gardens Institute

Joy Hughes
Founder, Solar Gardens Institute <http://www.solargardens.org>

Our Mission

- To educate and learn from the public about community solar energy.
- To promote good community energy policy at the federal, state, and local levels.
- To assist local organizations in organizing, developing, and managing community-owned solar energy projects everywhere.
- To provide a way for everyone to own solar panels, making clean energy affordable and available for all humanity.



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