Sonia Seda

From: ronald leonard <renewableenergy@me.com>
Sent: Saturday, July 31, 2021 5:09 PM
To: Comentarios
Cc: Edwardo Bhatia
Subject: Comments prepared for the RENEWABLE ENERGY COALITION (REC) re: NEPR-MI-2019-0009

The Renewable Energy Coalition would like to respectfully recommend a series of simple changes to proposed interconnection regulations. Due to the short time period to achieve the goals in act 17 we are exploring a fair review of grid issues by a group of independent entities (as previously described a separate document) and fundamental reforms as described below to bring about fair reform and rate payers relief of increasing cost and inadequate reliable service. We stand by to discuss and provide documentation and other examples of proven viable solutions to decrease cost and provide clean power on an immediate basis.

Actual Renewables 2018	Actual Renewables 2019	Act -17 Requirement 2025	Act -17 Requirement 2040	Act -17 Requirement 2050
2.0%	2.3%	40%	60%	100%

A limit of 1MW connected to the distribution grid will not work, that eliminated most of PR connecting to high voltages lines requires extreme cost and engineering including your own substation in many cases. On any US13.2… kVa distribution line they normally allow 10 MW to be connected as a example if PR's grid is so fragile the grid needs to be fixed renewable energy should not be artificially restricted.

Subsequently stating with out a reason/engineering basis that only 5MW generating facilities will be allowed on transmission or substation voltages, tells those who have multiple locations to wheel power to on the island it is not possible to do business here.

It is not the purview of renewable energy providers to fix inadequate or aged grid vulnerability. This should be done systemically after a systematic valuation of the grid is accomplished by an independent party and these issues must be dealt with as a government issue in order to conform with Public law 17. We have the team available to work to that goal quickly.

Federal funds are in place to do exactly that grid reconfiguration/ strengthing for 100% renewable energy. The grid must be made functional to allow two ways flow of renewable energy to insure ratepayers are getting the service they deserve and pay for.

Artificially limiting projects size on distribution grids guarantees weakness in reliability and other services that Renewable Distributed Clean Energy provides in the load pockets and it has been recognized in multiple studies, renewable energy on the grid benefits all ratepayers because of the free services it provides in strengthening the voltages, power spikes and other grid services.. like associated batteries/capacitors which prevent outages.

Similarly telling producer of “clean power” if they export power to the grid (benefiting local power customers) to an artificial low level of 300kWh, 10MWh and placing a cap of 50MWH ignores what needs are on any distribution or substation needs. Enginering analysis including historic and predicted future use is what is needed not artificial constraints without explanation.

This regulation is a case of the judge and jury arbitrary limiting access and competition in direct contravention to act 17 to achieve 40% by 2025.

A limit of paying for power exported in a behind the meter to ten cents is also, anti competitive, autocratic and discriminatory. When rate power power is priced at least double that now and is likely to go over 30 cents a kWh this tax supresses completion and ignores ratepayers need for clean energy. Not only is the renewable energy provider providing free grid services but is subject to a taxation for their generosity. The only fair way to limit compensation is to have a green power kW/MW limit based on historic usage negotiated in a fairly vetted contract at the time of interconnection and that any overages will be carried forward for 5 years with a proviso that at the end of that period the energy will then be credited in cash value at least a 20% discount of electricity cost at the time of settlement. Ratepayers deserve reliable, clean and affordable power not a continuation of the state of affairs they see today, increasing bills yearly and not being able to rely on the light's not being kept on. What has happened in major industries like pharmaceutical (A big employer)all the way down to residential ratepayers is voting with their feet. That has caused them to disconnect from the grid with their own clean power or more tragically leave the island entirely.

The final unequal treatment in the proposed regulatory change, is ratepayers with multiple locations being artificially restricted from wheeling power to their other locations to 120% of the consumption of the service agreements at the location where the Generating Facility is installed. There is no basis law for this restriction if a ratepayer has another facility needing power they are entitled to obtain clean power up to 100% of that load if they generate it themselves with clean power. The reality of a customer not having the physical room at one location to install renewable energy or in the case of things like solar/wind have a location without shading allowing better production from elsewhere they should not be penalized. The power placed on the grid from clean energy benefits all ratepayers, multiple independent studies have calculated that service to be worth well in excess of any compensation they would obtained my net metering or wheeling. Placing a limit on that grid access is anti competitive. The provider of energy should also be uncharge of how that energy is allocated to their associated locations without utility intervention or regulation. They should just be able to provide LUMA (others) with account #’s and allocation percentages. Billing should be transparent and without penalty. Community shared solar should be encouraged ratepayer relief from clean reliable power is the goal not the problem?

As to penalties mentioned, there is a serious lack of accountability in the case of PREPA to not conforming to the rule of law and as occurred in the past, kicking the can down the road, to the detriment of ratepayers. If the law requires net metering, wheeling, or a payment for provided clean energy or services arbitration or other remedies without a quick and final date of reckoning (Suggest 30 days) providing relief should be automatic. It is very easy to prove if an installation is in compliance with standards, law or documentation, but continued excuses for the Utility to not follow the letter of the law must end with an outside entity being enabled to force compliance. Providing fines to other normal remedies on a bankrupt utility have been lacking on obtaining ratepayer relied so far. So a independent entity /contractor should be enabled to provide physical interconnection, meter installation and billing relief must be automatic without the need of arbitration dragging out clear cut regulatory relief. Specifically just having a public Queue without teeth behind getting the queue to be eliminated by offering solutions/relief to foot dragging is not a solution. The

offering (shown as a change) in regulation taking a total of 60 days to deal with simple matters like interconnection of net metering to begin because no one installed a second meter is not a solution fair to ratepayers. A path to reform requires enforcement of regulations without undue expense or bureaucracy.

REC suggests a standardized expedited process like now implemented by the intervention of DOE providing the new automated interconnection filing process available to all jurisdictions. Every solar installation requires fire, building, and electrical permits. Unfortunately, procuring these permits is often a long, complicated, and expensive process. Collecting and reporting permit-related project data contributes as much as 30% to overall solar project costs, not to mention the time solar installers must spend tracking down local jurisdictions and their contact information.

Sunspec Alliance's Orange Button Project aims to lower these costs and simplify the permit process -- for free. In Sunspec's recent webinar, "Standardized Solar Data at the Tipping Point," both creators and users of Orange Button explained why the solar permit process is so challenging and how Orange Button helps to solve those challenges.. Nationally has now rolled out the solution for residential and other permitting automation on the 15th of July the application is live and available for all to use. Bringing Solar Permitting into the 21st Century.

In the United States, solar permitting is spread across more than 23,000 separate jurisdictions and 3,000 utilities. This makes for a fragmented and unstandardized process, leading to long waits for permits. In some places homeowners wait for months to get their systems on line. In fact, last year, solar project delays cost homeowners $16 million in wasted energy. The drawn-out permitting process also causes many customers to actually cancel their installations.

"There is extraordinary untapped potential for residential solar to advance climate and community resilience solutions in the United States. But we're held back by unstandardized, slow, expensive permitting processes that make solar installation far more difficult than it needs to be," says Rushad Nanavatty, managing director for RMI's Urban Transformation Program.
A new online permitting application, SolarAPP+, developed by the National Renewable Energy Laboratory, RMI, solar industry leaders, and local governments, is setting out to change that. SolarAPP+ is a universal web-based program that any local government can use, for free, to instantly process and evaluate permitting applications. The program reviews applications as soon as the solar installer submits them online, and then issues a permit after the fee is paid. This can cut the average permit processing time from five working days to less than an hour.

Immediately, four large jurisdictions have been using SolarAPP+ in a pilot project: Tucson, Arizona; Pima County, Arizona; Menifee, California; and Pleasant Hill, California. All of them have had great success. This has saved them money and time. "The permitting process was taking four weeks," says Tucson Mayor Regina Romero. "Now we give the **permit the same day**… We just approved about 450 installations in the last 60 days alone using SolarAPP+."

According to RMI SolarAPP+ Coordinator Arthur Coulston, "Industry has made significant progress improving their processes and lowering costs. But permitting has not seen the same improvement—and due to the growing volume of permit applications, it is even getting worse in some places. This is a critical challenge that

neither industry nor government can solve on their own. RMI has played an important role in bringing these stakeholders together to ensure the success of SolarAPP+."

We, REC, strongly suggest the institution of the Solar APP across jurisdictions on the island removing conflicts of interest from blocking ratepayer relief and reducing the cost of that solution blocking it being widely available. This would a first step to show a commitment to reform, and release major manufacturing and job creation to occur quickly.