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350NewOrleans.org

September 28, 2018

By Hand delivery and Email

Ms. Lora W. Johnson, CMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, La 70112

**In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A
RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS DOCKET NO. UD-18-03**

Dear Ms. Johnson,

Please find enclosed an original and three copies of 350 New Orleans' Comments in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one time-stamped copy to our courier, in accordance with normal procedures. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

A handwritten signature in blue ink that reads 'Renate Heurich'.

Renate Heurich
Vice President
350 New Orleans

**Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A
RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS DOCKET NO. UD-18-03**

Certificate of Service Docket No. UD-18-03

I hereby certify that I have this 28th day of September, 2018, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by
USPS or electronic mail.



Renate Heurich
Vice President
350 New Orleans

Before the Council of the City of New Orleans

Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A
RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS

DOCKET NO. UD-18-03

350 New Orleans' Response to The Council's Utility Advisors' White Paper

350 New Orleans appreciates this opportunity to provide comments on the White Paper on Community Solar presented by the Council's Utility Advisors in June 2018.

Our comments are focused on emphasizing inclusion of low-income subscribers, avoiding arbitrary limits to the potential capacity of community solar, as well as fair subscription credits that will ensure the opportunity for a successful program.

Capacity Limits

With regards to the 5% peak capacity limit established on page 37, we encourage a greater share, as that is the time of day when solar production is greatest and provides the most value to the grid. Additionally, this increased capacity allowance creates greater market value, as more projects will be allowed to participate and thereby stimulate jobs in the region for construction of CSG facilities as well as O & M.

Considering the urgency with which climate scientists demand a shift to 100% renewable electricity generation, and advancements in battery technology that can address issues of intermittent generation, there is no good reason to limit the community solar potential to 5% of annual peak capacity. When countries like Portugal are able to produce and handle 100% renewable electricity for a whole month¹, then we don't see any reason why we should limit our potential for community solar, as long as our community wishes to invest in it. John Farrell emphasizes that key to Minnesota's most successful community solar program in the nation is the fact that it *does not cap the development of community solar projects*.² (emphasis added in the original article) The New Orleans Climate Action Plan calls for 255 MW of local solar by 2030.³ One recent example illustrating the reliability of solar PV is hurricane Florence, where wind and solar were up and running the day after the storm.⁴

¹https://insights.jumoreglobal.com/energy-transition-portugal-breaks-100-renewables-mark/?utm_source=WebPush&utm_medium=yong

² <https://cleantechnica.com/2017/07/07/minnesotas-community-solar-program-best/>

³ <https://www.nola.gov/nola/media/Climate-Action/Climate-Action-for-a-Resilient-New-Orleans.pdf>, p. 23

⁴<https://www.cbsnews.com/news/hurricane-florence-crippled-electricity-and-coal-solar-and-wind-were-back-the-next-day/?ftag=CNM-00-10aab6a&linkId=57351015>

Low-income Customers

We welcome the carveout for low-income ratepayer participation, however, we think that 3% is too low of a number (30% of capacity limit shall be reserved for programs with at least 10% low-income subscribers, see page 10). Colorado demands 5%, Oregon 10%, Connecticut 20%, Hawaii 50%,⁵ Maryland 30%, NYC 20%.⁶

In addition, we suggest including specific incentives to achieve low-income ratepayer participation who are facing additional barriers related to financing, education and outreach.⁷ Here, the White Paper provides no details. The literature suggests financing via Green Banks⁸, and cooperation with nonprofit affordable housing providers.⁹ The 2016 ACEEE report indicates a high rate of energy poverty in New Orleans, ranking the city between number 2 and 3 among major American cities.¹⁰ It is vital that we include specific plans on how to ensure that low-income ratepayers can participate in a community solar program.

Subscription Credits

Herman Trabish describes the underlying ratepayer demand for clean energy as key for a successful community solar program.¹¹ Residents of New Orleans have installed rooftop solar in record numbers - 40 MW at the end of 2017, ranking number 13 in per capita solar PV installed in the U.S.¹² But Trabish also cites the importance of customers' need to see a return on their investment over the life of a community solar contract.

Unfortunately, the Advisors' proposal of subscription credits (page 43) falls far short of a framework that could ensure a successful community solar program. Limiting the value of the solar output to the "avoided capacity, energy and other directly quantifiable costs"¹³ translates into compensation so low that subscribers would never see any financial benefit of their commitment, but would actually incur a loss. While there may be a few ratepayers in New Orleans who are willing to pay a premium to participate in a community solar project, we can

⁵ <http://www.lowincomesolar.org/wp-content/uploads/2018/05/LISPG-Cmtty-Solar-Policy-Chart.pdf>

⁶ <https://solarbuildermag.com/financing/incentivize-community-solar-projects-benefit-low-middle-income-customers/>

⁷ <https://www.lowincomesolar.org/best-practices/community-solar/>
<https://www.greentechmedia.com/articles/read/making-community-solar-work-for-low-income-customers-is-crucial-for-growth#gs.1LWooBM>

⁸ <https://www.lowincomesolar.org/toolbox/green-banks/>
<https://www.greentechmedia.com/articles/read/making-community-solar-work-for-low-income-customers-is-crucial-for-growth#gs.1LWooBM>

⁹ <http://www.lowincomesolar.org/wp-content/uploads/2018/05/LISPG-Cmtty-Solar-Policy-Chart.pdf>

¹⁰ https://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf

¹¹ <https://www.utilitydive.com/news/what-makes-a-successful-utility-led-community-solar-program/442663/>

¹² https://environmentamerica.org/sites/environment/files/reports/EA_shiningcities2018_scrn%20%282%29.pdf

¹³ White Paper of the Council's Utility Advisors Regarding Community Solar and Other Shared Distributed Energy Resources, June 2018, p. 43

safely assume that none of the large number of low-income ratepayers would be able to participate under these conditions.

In our view, it is essential to apply a Virtual Net Energy Metering policy, which is currently being developed in Austin, TX, targeting low-income, multifamily affordable housing¹⁴. California has a pilot program for "Virtual Net Metering, which allows the electricity produced by a single solar installation to be credited toward multiple tenant accounts in a multifamily building without requiring the solar system to be physically connected to each tenant's meter".¹⁵ In 2016, Virtual Net Metering policies were already in place in 16 states.¹⁶

Thank you for this opportunity to provide our comments to the Advisors' White Paper on Community Solar.

¹⁴ <https://www.lowincomesolar.org/toolbox/net-metering/>

¹⁵ http://www.gosolarcalifornia.ca.gov/solar_basics/net_metering.php

¹⁶ <https://ilsr.org/virtual-net-metering/>

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