

*Chesapeake Climate Action Network • Sierra Club – Washington D.C. Chapter (possible) •
Wentworth Green Strategies •*

May 26, 2016

Councilmember Cheh,

Thank you for introducing B21-650 – Renewable Portfolio Standard Expansion Amendment Act of 2016, and for holding a hearing on this legislation in your committee on May 23rd. Following that hearing, the groups listed above respectfully offer comments on the testimony submitted by the District Department of Energy & Environment (DOEE) on your legislation.

First, we would like to commend DOEE for its strong support of clean energy in the District. The Department has been a strong partner, working collaboratively with the clean energy business community, the non-profit sector, and District residents to make D.C. the healthiest, greenest, most livable city in the nation. We are therefore not surprised, but nonetheless encouraged to see that DOEE supports the goal of increasing the Renewable Portfolio Standard (RPS) to move the District toward achieving the Sustainable D.C. goal of 50% renewable energy by 2032. We agree with the Department that the RPS sends an important signal to residents, investors in renewable energy, and developers that the District supports clean energy and wants new development of renewables to meet the city's sustainability goals.

In its testimony to your committee, DOEE stated that it would support the bill with certain proposed changes. We support many but not all of those proposals. Please see more detailed comments on those proposals below.

Flexibility

We support program flexibility for expanding low-income solar. But that flexibility should be accompanied by milestones and goals, including goals for ensuring that low-income DC residents, and residents in every ward in the city, gain access to energy savings and solar jobs. Expanding low-income solar across the District is a big undertaking, and it will require the coordination of other departments and stakeholder groups. Implementing the community solar program will help, but deploying that program to reach as many households as possible needs to be part of an overall clean energy strategy. We encourage DOEE to develop and share a plan that includes goals, milestones, programs, projects, and activities designed to bring solar energy to low-income District residents.

Expanding Allowable Uses for the REDF

We support expanding the allowable Uses for the REDF to include electrical upgrades, structural roof reinforcement, energy efficiency, and other supporting services deemed necessary to expand clean energy citywide. DOEE also mentioned energy storage as an appropriate use of REDF funds. We would like to learn more about the Department's vision for using energy storage as a tool to increase the value and utilization of clean energy. In addition, we would suggest including job training and job creation in the allowable uses for the REDF.

Expand Local Renewables

We support the concept of establishing more incentives to encourage the development of local renewables in addition to solar. However, more information is necessary before including such changes in legislation. Key issues that need to be addressed include the environmental and financial characteristics of the different technologies that DOEE is interested in, the appropriateness of encouraging those technologies through the RPS, and the level of incentive that would be necessary to establish a market for those technologies. Following passage of this legislation, we would like to work with DOEE to address these issues.

Create a Second Class of SRECs for post-2017 installations

We do not support creating a second class of SRECs because it has the potential for disturbing a robust SREC market already in place. We believe that this proposal is a solution in search of a problem. Any savings attributable to such a policy change would be de minimis at best, and risks causing uncertainty and turbulence in the marketplace. The solar market in the District needs to grow faster, not slower, and this proposed change could hinder those efforts.

Grandfather Existing Supply Contracts

We support grandfathering existing supply contracts because of all the reasons outlined in the Director's testimony.

Fix the Sustainable Energy Trust Fund

If DOEE can establish that the low-income goals of this legislation can be met using the REDF and a fully funded SETF then we would support the smaller increase to the SETF surcharge the DOEE is requesting. Our support for a lower surcharge increase is contingent upon DOEE being able to hit its low-income solar goals with existing funding sources.

Research Additional Leveraging Options

We strongly support researching additional leveraging options as one method of multiplying the effectiveness of the program.

Thank you for giving us this opportunity to provide comment. We look forward to working with you and your office to ensure that D.C. remains a leader in building a robust and inclusive clean energy economy.