



June 23, 2015

Lee Eng Tan
Senior Attorney, Office of the General Counsel
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Solar Energy in Florida- Request for Comments

Dear Ms. Tan,

On behalf of the Florida Solar Energy Industries Association we would like to thank you for the opportunity to provide input on what policies or programs would be most effective at promoting demand-side solar energy systems for the customers of the state of Florida. The Florida Solar Energy Industries Association (FlaSEIA) is the state's largest solar energy trade association with the mission of growing Florida's economy through solar photovoltaic (PV) and solar thermal deployment. We seek to support and advance long term, reliable policies to grow the solar market in Florida, resulting in job creation and local economic growth, as well as diversifying the state's fuel mix and protecting ratepayers.

Specifically, FlaSEIA recommends upholding the current net metering rules, continuing and expanding support for distributed solar thermal and PV resources and promoting low income ratepayer incentives. We provide additional rationale and information for each recommendation below. Please note, the comments contained herein reflect the views of FlaSEIA and not the views of any individual member or company.

Net Energy Metering

The current net-metering program is an essential foundation for customers to meet their on-site energy demands. FlaSEIA recommends that the Public Service Commission preserve Florida's current net energy metering laws and continue to provide access in a non-discriminatory manner to all classes of ratepayers. Net energy Metering (NEM) has been shown to be a successful policy instrument for expanding the renewable energy markets throughout the United States. A 2014 analysis by the National Renewable Energy Laboratory that analyzed policy initiatives that encourage private investment and building solar photovoltaic (PV) markets found that "states in all contexts experienced more robust markets with the implementation of interconnection and net metering." For this growth to continue throughout the state of Florida, NEM users should not be penalized for their decision to install distributed energy on their property. It is critical for the Public Service Commission to maintain reliable, non-discriminatory ratepayer service to all customers. Punitive and non-cost based charges should also be prohibited. We fully agree with and support the comments submitted by IREC concerning Florida's net energy metering (NEM) rules.

Interconnection

FlaSEIA supports IREC's proposals to reform and improve interconnection procedures in the state. Efficient interconnection procedures are vital for solar projects to be cost effective and time efficient. The current interconnection procedures are outdated and these methods, in line with IREC's recommendations should facilitate growth of the solar market. FlaSEIA recommends the Commission review IREC's *Model Interconnection Procedures* and other recent developments to orient the discussion¹.

Low Income Incentives

Solar financing options have catalyzed companies and organizations to enter a nascent market that can cater to low income consumers. The programs work by lowering or eliminating credit requirements and debt to income requirements².

FlaSEIA requests that the Commission seek input from stakeholders in designing a program that provides solar financing arrangements to low income homeowners in order to establish a program that offers a higher upfront rebate for income qualifying customers to participate without exclusion of most income or credit quality barriers. A program using energy conservation dollars to backstop institutional loans and a green bank system have been successfully implemented in other states.

¹ IREC. *Model Interconnection Procedures*, 2013 available at <http://www.irecusa.org/model-interconnection-procedures/>

² Solar Energy Loan Fund program available at <http://cleanenergyloanprogram.org/>

Solar PV

FlaSEIA supports an intermediate PV incentive with a clear path to zero incentives that is tied to achieving a specified goal of developed megawatt capacity. FlaSEIA believes historically participating FEECA Utilities failed to collect accurate data or implement program revisions which ultimately led to the decision of the expiring of the previous Solar Thermal and Solar PV Pilot Programs based on cost effectiveness. During the time of the solar pilot program, FlaSEIA made numerous requests to reduce the \$2.00 per watt rebate based on a significant reduction in equipment during that time which would have allowed for greater participation for all rate payers and more accurate data. We believe that a new incentive program could be beneficial if it was made available to all ratepayers and is tied to a defined goal of capacity development, with a path to a zero incentive market. To protect low income ratepayers we suggest exempting the first 1000 kWh for customers before paying in to a conservation fund. We look forward to working with the Public Service Commission during any future workshops to find solutions that promote demand side solar.

Solar Thermal

FlaSEIA recommends seeking alternatives to promoting solar thermal across all ratepayers since solar thermal applications are well-suited for Florida's environment. A modified residential solar thermal program will positively impact Florida's winter peak as well as diversify Florida's energy mix.

FlaSEIA recommends the Commission pursue programs that can reduce winter peak through a modified solar water heating rebate program. This technology has long been identified as a cost-effective way to reduce customer demand and FlaSEIA hopes a modified program will be reviewed in the near-term.

Conclusions

FlaSEIA recommends upholding the current net metering rules, interconnection reform, continuing and expanding support for distributed solar thermal and PV resources and promoting low income ratepayer incentives. We thank the Commission for your consideration of this input.

Sincerely,

Reed Wilson
President, Florida Solar Energy Industries Association.