



Public Service Commission of the District of Columbia
1325 G Street, NW - Suite 800 Washington, DC 20005
(202) 626-5100

PUBLIC COMMENTS

Date/Time Sent: Jun 22 2020, 3:38PM

To: Brinda Westbrook-Sedgwick, Commission Secretary

Fullname: Nicola Hayes-Allen
City, State, Zip: Washington,DC,20002
Email Address: nicolahayesallen@gmail.com
Company Name: Not Available

What is your position regarding the issues identified in the procedural schedule for this case?

Mixed

Public Comments:

Request to Raise the threshold to 200% more quickly

With the DC government's ambitious renewable energy mandate (100% by 2032), our city has the potential to lead the way among cities and states. We cannot realize this ambition, though, unless DC rooftop solar is encouraged to the fullest extent possible. In this context it is shocking that DC is behind Maryland (where the threshold is 200%) in encouraging residential rooftop solar.

Not every household has a roof that can generate the electric capacity needed. Roofs that are north-facing or shaded have limited solar potential. Multiple apartments can rarely be fully supplied from a single shared roof. If we are to be self-sufficient in DC clearly we must encourage households that are able to generate a net solar excess to do so to the fullest extent.

Pepco has experience of adapting to a 200% generation threshold in Maryland. They can apply that experience in DC, I am sure, in going directly to the same 200% threshold. DC's vision of fully renewable energy by 2032 is bold. Timid 20% incremental steps towards that goal fail to match our city's vision. Our reality in DC must be bold too. So I ask the PSC to move to the 200% threshold without further delay.

Request to change the Month for refunding Excess kWh Generation from December to April

My solar installation was planned to generate a net excess of 3,000 kWh from April to December each year: this excess to be used for HVAC heat in the cold months (Jan to March). December is therefore the worst time for solar households with HVAC heat to have our banked kWh taken away! We will receive a taxable check for our 'excess' production in December, only to have to buy back those same kWh the next month!

The high number of kWh being bought back will also make our solar installations appear to be 'for profit'. In which case the IRS can disallow a large part of our Federal Tax Credit on the solar installation in the first place. IRS rules are that solar electric systems, to qualify for the Section 25D credit, must be specifically for energy use in the taxpayer's home and not for profit.

Can DC please therefore simply change the month when this annual accounting is done? Can we please do it in April (the month when most states do this)? This will help households that have made the switch from gas to solar HVAC. It will also protect the HVAC industry in DC, by continuing to make HVAC attractive to future solar households. And it will help the city move towards a zero carbon economy.



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ACKNOWLEDGEMENT OF PUBLIC COMMENTS

Date: Jun 22 2020, 4:04PM
Fullname: Nicola Hayes-Allen
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Email Address: nicolahayesallen@gmail.com
Company Name: Not Available
Docket Number: RM9-2020-03-M - 4

Thank you for your submission of comments regarding RM9-2020-03-M. Your comments have been docketed in the case and are available on our website, www.dcpsc.org.

Regards,

Brinda Westbrook-Sedgwick
Commission Secretary
(202) 626-5150