

November 20, 2020

Brinda Westbrook-Sedgwick, Commission Secretary
Public Service Commission of the District of Columbia,
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Sent electronically to https://edocket.dcpSC.org/public/public_comments.

RE: Notice of Proposed Ruling For Chapter 29 as Published on October 23, 2020
Energy Equity Impact, Request for Further Consideration

Dear Ms. Westbrook-Sedgwick and Members of the Commission:

Thank you for the opportunity to provide comment on the Notice of Proposed Ruling (NOPR) published October 23, 2020 in the D.C. Register, which proposed amendments to Section 2902 of the Commission's Renewable Energy Portfolio Standard (RPS) rules. Groundswell is grateful to have this opportunity to share our perspective and to make the Commission aware of the unintended negative impact on energy equity associated with the most recent NOPR, which would critically jeopardize a low-income community solar project that, after two years of faithful work, is finally poised to move into construction and provide a projected \$300,000+ in lifetime utility cost savings to low-income residents. Importantly, the project is located at an affordable housing community directly adjacent to a distribution feeder serving the District, to which the project plans to interconnect. This project has already been granted Authorization to Install (ATI) by Pepco.

As background, Groundswell is a 501c3 nonprofit organization that builds community power, and the District of Columbia is our hometown. Developing and managing community solar projects that serve our low-income neighbors with deep utility bill savings to reduce energy burdens is fundamental to our mission and our work in DC and in other communities that we serve.

For the past two years, we have been working in collaboration with the Montgomery County Green Bank to bring a 273kW community solar project to an affordable housing community that is owned and managed by the Montgomery County Housing Opportunities Commission. The project replicates the pioneering approach Groundswell developed to serve DC with equitable community solar by translating the value of DC SRECs into free community solar subscriptions for low-income residents. Each participating resident will save about \$500 per year on their utility bill, resulting in more than \$300,000 in aggregate utility bill savings for low-income residents over 15 years. The

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project is located directly adjacent to a DC-based distribution feeder, the interconnection to which is essential to delivering equitable outcomes for low-income members of the community in alignment with DC and Maryland's shared goals of an equitable energy future that supports affordability and inclusive prosperity.

Getting to this point has been a two-year journey that has included overcoming many challenges through innovative approaches that keep service to our low-income neighbors at the center of the project. These challenges have included seeking and receiving HUD approval to install solar panels on the property.

The project received ATI from Pepco in July of this year and it is now in the final permitting process, with construction targeted to start in January 2021. As a community solar project, the interconnection itself is a new service so there is no existing meter that it ties into. Because the most recent draft NOPR requires that projects be interconnected through meters that are already served by a distribution feeder originating in the District, if implemented as drafted, the policy would stop the project and eliminate more than \$300,000 per year in solar energy savings for low-income households by eliminating the project's access to the DC SREC market.

Request: Grounded in the goals of equity, affordability, and access to the renewable energy marketplace that the District of Columbia and its neighbors in Maryland share, we would ask that the Commission include a provision in the final rulemaking that would allow community solar projects that serve low- and moderate-income households and that have achieved Authorization to Install be "grandfathered" in and allowed to proceed under existing provisions. We appreciate the Commission's commitment to bring greater clarity to the regional solar market as it relates to access to DC's solar market via "cross-border" feeders, but would request that you please do so with consideration of the good that can still be realized by projects such as ours that have been proceeding faithfully forward based on existing policies.

With gratitude for your consideration,



L. Michelle Moore
CEO, Groundswell