

St. Barnabas' Episcopal Church

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February 28th, 2021

Brinda Westbrook-Sedgwick, Commission Secretary
Public Service Commission of the District of Columbia
1325 G Street NW, Suite 800
Washington, DC 20005

VIA ELECTRONIC SUBMISSION

Re: Notice of Proposed Rulemaking Chapter 29 as Published on February 5th, 2021.

Dear Commission Secretary:

Thank you for the opportunity to provide comment on the Notice of Proposed Ruling (NOPR) published February 5th, 2021 in the D.C. Register, which proposed amendments to Section 2902 of the Commission's Renewable Energy Portfolio Standard (RPS) rules.

Saint Barnabas' Episcopal Church has served the Washington, D.C. metropolitan area since 1830. Located within the Beltway, we have the unique privilege of being culturally nestled amidst the D.C. and Maryland housing areas. And so we continue to serve parishioners and community members from both D.C. and Maryland on a weekly basis. We currently have about 100 members from D.C., Maryland, and Virginia. We hold services on Saturday evenings and Sunday mornings. In addition to traditional church services, we also sponsor a significant number of community service programs open to all people from our D.C. Metro Community. And since our church has been a part of the wider community for so long, some of our programs have served the public for decades, now known and relied upon for their continuance. Our Thrift Store is one of these ministries, which has helped D.C. and Maryland residents in a variety of ways. Not only is it popular as a genuine thrift shop with consignments, but we also help families in hardship, providing clothes and supplies to community members who have lost their jobs, or are down on their luck, or have lost everything in a house fire. We've continued to collect donations and supplies for the local food pantry. We've provided a safe space for therapy groups, like AA, NA, Al-Anon, etc. so that, over the decades, people have come to rely on our church as a beacon for hope in their recovery. We've helped the homeless as participants of the Warm Nights program, providing shelter and food. We are committed to helping the Capital Pregnancy Center in D.C. and have a history of offering clothing and baby care products for their closets, even contributing hand-knitted blankets, socks, and baby hats created by our Women's Group. As the clergy at this church, I've personally helped and counseled people from D.C. as well as Maryland. Based on people's declared 'home' state, whether in D.C. or in Maryland, I've recommended and/or enabled them to reach the needed homeless shelters, food banks, and other services within those areas.

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Over the last ten years, we began our “Free Thanksgiving Dinner” for anyone in the Metro area who wants to join us, thanks to an amazing cook who creates a full turkey dinner that is more scrumptious than my own. This event is so successful that our church members come to eat with our community members, offering a beautiful glimpse of diverse socio-economic groups coming together.

On a lighter note, we’ve hosted flea markets, joyously watching as vendors and seekers from diverse backgrounds in the D.C. Metro Area gather together. St. Barnabas’ has also been used as a venue for a community choir’s performances, a polling station, and a Panamanian marching band’s practice ring.

To ensure its continued prosperity, as well as to benefit the wider community and the planet, the Church decided to dedicate a portion of its land to renewable energy. The Church has invested significant time, effort, and money into the development of a solar project.

The solar project has been in development for three years, and the interconnection and permitting requirements are nearly complete. The project relies on D.C. SREC eligibility, which the most recent NOPR seems to jeopardize. The Church has significantly invested in this project because the Church is in a location served by a feeder that also serves the District of Columbia. The Church draws all its power from this feeder, and this feeder runs onto the Church’s property and right through the precise location of the solar project in development.

However, after significant time and investment, the electric distribution company refused our request to connect to that feeder, telling us we cannot connect to it because it lacks the capacity for our project’s solar energy at this time. The electric distribution company told us we instead had to interconnect to a non-D.C. feeder that runs right alongside and on the exact same set of poles as the D.C. feeder on our property. Up until this most recent NOPR, we understood that since the Church’s solar project is in a location served by a feeder that also serves the District of Columbia, our project would be eligible for D.C. SRECs.

Our reading and understanding of the law and regulations at the onset of this process (April 2018) made it clear that our project would be eligible to receive D.C. SRECs and that the Commission would welcome our Project given that it is “in a location served by” a feeder that also serves the District of Columbia, and would provide solar energy to the D.C. Metro Community to address climate change.

It is of grave concern that the intent of the NOPR dated February 5th seems to be to now deem ineligible solar projects that don’t have an advantageous interconnection agreement, regardless of the project’s location. We feel strongly that our project meets the requirements as they are defined in the regulations. Further, we want the Commission to understand that there are negative consequences to entities like our Church when the Commission changes the regulations.

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The current situation with the COVID-19 pandemic has put tremendous emotional and financial pressure on our congregation, community, and most of the underserved members of the D.C. Metro area that we support and serve. As you deliberate and make final decisions regarding the regulation, please understand that your actions or inactions have consequences that may be dire.

In our specific case, if we are not able to move forward with the project and cannot quickly find an alternative use of the land then our entire Church and all that it contributes to the D.C. Metro community may be in jeopardy. We need the benefits from our solar project to continue to operate and serve our congregation, including its D.C. and Maryland-suburb citizens, as well as the wider D.C. Metro community.

Lastly, we understand that, at times, changes need to be made to regulations. If the Commission now intends to disqualify projects that cannot interconnect to feeders that serve D.C., then given that we serve the D.C. Metro community and have openly and honestly followed a path that you defined in your original regulation, we ask that the Commission grandfather projects such as ours that are in geographic locations served 100% by D.C. feeders.

Peace, blessings, and safe health to you, especially in this turbulent time of pandemic,



Rev. Shell T. Kimble

