Dear Commissioners and PUC staff,

Thank you for the opportunity to submit comments regarding your review of the Net Metering program.

SunCommon respectfully submits the following comments and if the staff or Commissioners have any questions we could help answer please let us know.

We believe that net metering has been an incredibly valuable, if modest, part of Vermont's work to transition to a clean energy economy, and meet the state's clean energy goals. Even today net metering provides a small share of Vermont's overall electricity supply and a similarly small part of overall utility costs. The benefits have included but are not limited to:

· Successful elimination of Vermont's expensive afternoon peak, pushing that peak to a lower level later in the day. This continues to save Vermonters tens of millions of dollars every summer.

· More efficient use of power, by often putting clean electricity generation at the point of use.

· Direct pollution reduction, due to net metering generation offsetting the burning of fossil fuels, which remain the marginal fuel most of the time, in New England.

· Tremendous local economic investment. SunCommon alone spends nearly $20 M annually on local salaries, benefits and purchases from local vendors.

· Modest savings for Vermonters who have invested their own money in the installation of clean energy generation.

· Perhaps most important of all, the net metering program has been the main avenue for Vermonters to take meaningful action on their own to address their energy footprint and learn about other things they can do to address the climate crisis. We will not address our climate crisis and meet our state's climate change goals/requirements, without Vermonters engaged in the solutions. When a SunCommon employee visits a Vermonter's home, talks about electric vehicles (sometimes even doing test drives in our EVs), talks about and or sells heat pumps, and educates the potential customer on the benefits of grid integrated energy storage, we are doing critical community engagement that is required for our future.

Net metering is a successful program and, in this time, when all science is saying that we need to be moving faster to address the climate crisis, curbing a successful program makes no sense. We should be looking to continue what is working and developing new programs to build on our success.

The information submitted to the Commission by our Vermont utilities demonstrates that even when you ignore most or all of the above benefits, net metering costs can be attributed to very modest rate increases, of generally less than ½ of 1% annually. And, the above benefits should not be ignored when considering total societal costs as the PUC does.

Net metering projects have received significantly less support in the form of offsetting rates, the elimination of direct state incentives, and a reduction in the federal tax credit. The 4% drop in the federal tax credit that went into

effect Jan 1, 2020, represents more than $1000 dollars on the average home PV installation. Meanwhile they are also paying more in fees to utilities to improve our electricity grid and upgrade transformers, and PV module and inverter costs have increased with tariffs at the federal level. The industry at large has done well to track these changes, and reduce costs or at least keep them flat over the past couple years.

Looking forward, at the end of 2020 the federal tax credit will drop to 22%, and at the end of 2021 it is scheduled to drop to 0% for installations owned by home owners and 10% for commercially owned projects. We believe that these changes combined with the Department's recommendations could be crippling, and put solar out of reach for Vermonters.

We ask that the PUC consider the following recommendations:

- Keep all of the net metering program adjusters unchanged in 2020.
- Make any change in 2021 contingent upon whether or not the federal government extends the solar tax credits.

Thank you for your time and consideration.

Sincerely,
James Moore