

Aug. 28, 2024

Jeff Killip
Executive Director & Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Comments by Washington Solar Energy Industries Association on PSE's Schedule 667, Purchases From Distributed Solar Photovoltaic Systems (Docket UE-240565)

Washington Solar Energy Industries Association (WASEIA) appreciates the opportunity to comment on this docket. We would also like to commend PSE for bringing some innovative, forward looking ideas to the multifamily solar discussion. Multifamily solar deployment in Washington has lagged behind other states. Some fresh perspectives may help reverse that trend.

WASEIA asks that UTC seek further information from PSE regarding the calculation of its proposed \$0.067130 per kWh "Solar Energy Credit" excess generation rate for production that is not consumed on site. In its cover letter for its initial UE-240565 filing, PSE cites Exhibit A as the source of this Solar Energy Credit figure and also references PSE's March 31, 2023 "2023 Integrated Resource Plan ("IRP") Progress Report" as the source of this figure but does not further quantify how this figure was calculated.

That figure is considerably below PSE's current Schedule 7 retail rates for residential customers: \$ 0.090508 per kWh for the first 600 kWh per month and \$ 0.109469 per kWh for usage over 600 kWh per month. That is also the rate that residential and small commercial solar customers with interconnection agreements under Schedule 150 would receive for electricity returned to the grid.

WASEIA appreciates that other provisions of Schedule 667 filing could give more flexibility to solar customers operating systems above the 100 kWh size threshold for full retail net metering eligibility, however as the Washington Academy of Sciences' Value of Solar Study commences, WASEIA is concerned that PSE's proposed "solar energy credit" in this filing could be used as precedent in the process to research, negotiate and establish a successor tariff.

Creation of any successor tariff should be the result of a robust public process, not a unilateral proposal from any single party, and must be informed by the study. WASEIA recommends that the UTC affirms that future adjustments to this credit will be informed by the results of the Washington State Academy of Sciences Value of Solar and Storage study.

Thank you.

Bill Will
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Washington Solar Energy Industries Association