

2 June 2020

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE, Lacey, WA 98503.  
P.O. Box 47250  
Olympia, WA 98504-7250

Solar Installers of Washington appreciates the opportunity to comment on the first draft rules under docket UE-191023.

The draft, in general, reflects the content and the spirit of the statute. We would however like to note the important contributions that net-metered renewable resources have in ensuring that all sales of electricity to Washington retail customers will be and will remain greenhouse gas neutral.

Presently the state has approximately 213.33 MW of non-utility installed solar (38 MW installed in 2019); that figure will continue to rise until the net metering cap of 4 percent of peak demand in 1996 for each utility is reached or until June 30, 2029, when the existing net metering law sunsets. These retail sales are offset at a 1/1 ratio on the customer's bills and systems have a lifespan of 25 years.

If this sales offset is not modeled accurately in a Clean Energy Implementation Plan, a net-metered system's retirement, replacement or expansion will profoundly change CEIP'S specific target. We therefore recommend that a utility is by rule required to account for this retail sales offset in their CEIP.

We thank you for the opportunity to provide comment.

Sincerely,

Bill Will  
Business Growth & Development Director  
Solar Installers of Washington

cc: SIW Board  
Brad Boswell, Boswell Consulting