



## ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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January 22, 2021

### SENT VIA WUTC WEB PORTAL

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: Puget Sound Energy Proposed Revision to Tariff WN U-60, Schedule 134, adding voluntary community solar energy service, Docket UE-200998

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the January, 28 2021, Open Meeting. These comments address Puget Sound Energy's (PSE) proposed changes to the Company's tariff WN U-60, Schedule 134, adding voluntary community solar energy service. Public Counsel appreciates the discussions and the preview PSE provided to Public Counsel and other stakeholders to elicit feedback on the project.

If approved, PSE's filing would allow it to offer an additional voluntary energy service that provides customers with community solar energy choices, which the Company states will help meet its customers' clean energy goals. PSE also states that their customers want to support solar development, but many face barriers to rooftop solar—including lack of home ownership, high upfront cost, and rooftop suitability. After reviewing the filing, Public Counsel believes the new tariff will allow more customers to take advantage of clean energy at a more affordable price.

#### ***Public Counsel's Recommendation***

Public Counsel recommends the Commission allow the new tariff schedule service, Schedule 134—Community Solar Project Services, to take effect.

#### **A. Residential Customer Subscription**

Customers will have the opportunity to select specific solar resources they would like to subscribe to. Once enrolled, they will pay a monthly subscription fee for a share in a local solar resource. Customers may purchase one or more shares at a monthly rate per share, and will see

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financial benefits in the form of avoided energy credits associated with the production of the solar resource they are subscribed to. No customer may subscribe to greater than 40 percent of a project's shares or to greater than 120 percent of their average monthly consumption, as determined over a one-year period. If the program is fully subscribed, customers may sign up for a waiting list. If and when new shares become available due to termination by a participating customer, those on the waiting list will have priority enrollment to those options.

The minimum term for this service is a period of one year. Customers must provide 30 days' notice to the Company if they wish to terminate prior to the expiration of their term. Customers who choose to discontinue their service under this schedule prior to the completion of the one-year term will be charged an early exit fee equal to one month's rate per share. Customers who move out of the Company's service territory and/or who qualify for the Income Eligible Option will be exempt from the one-year term.

Public Counsel believes these terms and conditions are reasonable and provide PSE customers an affordable option to access solar resources without having to own or lease solar panels on their home.

## **B. Income Eligible Option**

Public Counsel commends the Company for providing an income eligible option. Eligible customers will be able to subscribe to one share of community solar at no monthly cost to allow the customers to participate and benefit from the community solar project. The funding for these customers may be supported by WSU Renewable Energy System Incentive Program, any awarded Department of Commerce low-income solar grants, funds from other PSE voluntary product reserves, funding from special contracts, voluntary cost sharing from general participants, and alternative third-party sources. Income eligible customers will be exempt from the one-year term minimum requirement.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Sarah Laycock at (206) 496-9989 or via e-mail at [Sarah.Laycock@ATG.WA.GOV](mailto:Sarah.Laycock@ATG.WA.GOV), or Stephanie Chase at (206) 521-3212 or via e-mail at [Stephanie.Chase@ATG.WA.GOV](mailto:Stephanie.Chase@ATG.WA.GOV).

Sincerely,

*Lisa W. Gafken*

/s/

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