

Solar Horizon LLC

P.O Box 50805
Bellevue WA 98015

January 16, 2019



Filed Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary
State of Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Received
Records Management
01/17/19 08:33
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Second Response to Small Business Economic Impact Statement (SBEIS) Questionnaire, Public Utility Regulatory Policies Act, Obligations of the Utility to Qualifying Facilities, WAC 480-107 Docket U-161024

Dear Mr. Johnson:

Solar Horizon provided an initial response to the Small Business Economic Impact Statement (SBEIS) Questionnaire on December 14, 2018. Following that submittal, we were contacted by UTC staff member Brad Cebulko to clarify our comments. Based on these discussions, and further research Solar Horizon would like to provide this second response which supersedes the previous submittal.

Solar Horizon is a small business renewable energy developer, owner and operator. We have less than 5 employees, hiring subcontractors for construction and professional services. We develop, own and operate solar renewable energy systems which are typically less than 1,000kW in size.

We support the State and the various stakeholders in their efforts to increase the use of low-cost renewable energy through the installation of small renewable energy Qualifying Facilities (QFs) under Chapter 480-107 WAC. With regards to economic impacts to small businesses developing, owning and operating QFs, we have the following comments to your questioner:

- 480-106-040 (3). When calculating the avoided cost, the value or cost of distributed energy resources at the distribution circuit level should be included in the calculation. For example, if constructing new or larger substations or distribution or transmission lines can be avoided by the installation of distributed renewable energy systems in a specific location or on a specific circuit, there could be substantial avoided costs which could be reflected in higher regional value.
- While QF contract values for firm, wind and solar energy products are detailed in the Utility's respective QF tariffs, the value of the renewable energy credits (RECs) do not appear to be quantified. In order to promote deployment of additional energy resources, it would be helpful if REC values were specified in the appropriate tariff.

Solar Horizon appreciates the opportunity to respond to your economic questioner. Please feel free to call or email me with any questions you have.

Sincerely,

DAVID W. TOMLINSON

Solar Horizon LLC

Bus: (425) 747-7190

Cell: (425) 463-6741

Email: DTomlinson@Solar-Horizon.com

