



Finding Pennsylvania's Solar Future Comment & Response Document

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Department of Environmental Protection
November 15th Stakeholder Meeting
Messiah College



Comment Period Overview

- Draft *Pennsylvania's Solar Future Plan* was released on July 7th, 2018.
- Comment period was open for 45 days, ending at 11:59 p.m. on August 20th.
- Commentators could submit comments through eComment, as well as through email and traditional mail.

Comment Period Overview

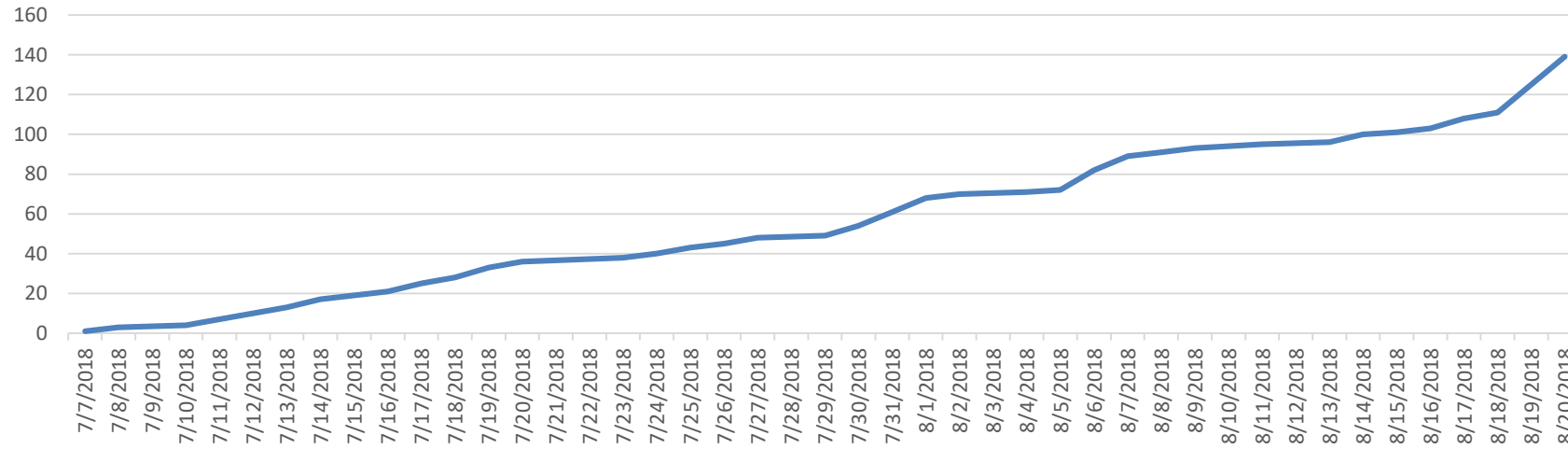
- The Department received comments from 138 individuals and organizations.
 - 136 online, 1 hard copy, and 1 email
- Comments included support for the project overall or specific elements of the Plan.
- Comments also included technical and economical concerns, as well as suggestions for adjustments to the strategies or the removal/addition of strategies.

Comment Period Overview

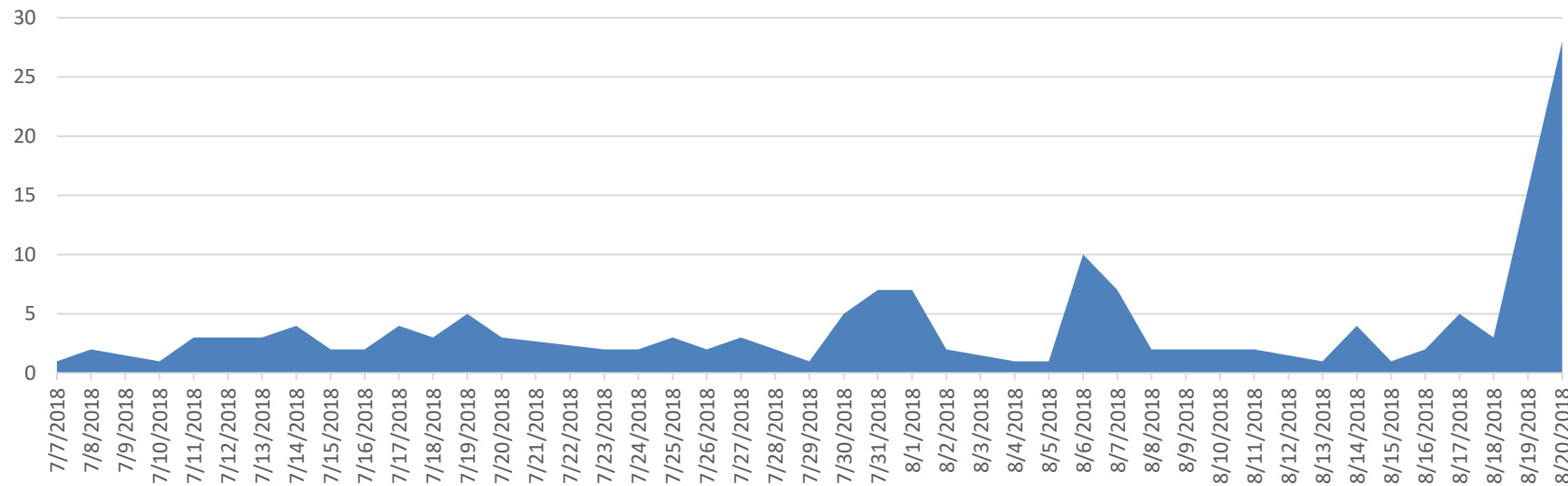
Bucks Environmental Action	Climate Reality Project: Susquehanna Valley PA	Chestnut Hill United Church	PPL Electric Utilities Corporation
ARM Group Inc.	Haverford College	FirstEnergy	University of Denver
Revival on Lincoln	Bucks County Biscotti	Duquesne Light Company	Pennsylvania Farm Bureau
Spilman Thomas & Battle PLLC	Physicians for Social Responsibility -- PA	Mid-Atlantic Renewable Energy Association	PennEnvironment Research & Policy Center
Lewis and Clark Law School	Concerned Citizens of Franklin County	PJM Power Providers Group (P3)	Solar United Neighbors of Pennsylvania
Union for Concerned Scientists	Philadelphia Solar Energy Association	Counsel to Pennsylvania Energy Consumer Alliance	Delaware Valley Regional Planning Commission
GreenBeams	ET Capital Solar Partners	SEEDS of NEPA	GRID Alternatives
Bucks County Sierra	Bethlehem Environmental Advisory Council	County Commissioners Association of PA	Earthjustice
Marcellus Shale Coalition	Eneref Institute	Sunrun	WGL Energy
AndersonAlternative.com	Energy Association of PA	RER Energy Group	Dynamic Energy
PECO Energy Company	Pennsylvania Public Utility Commission	EMS Environmental, Inc.	

Comment Period Overview

Number of comments Over Comment Period



Number of Comments By Day



Comment Period Overview

- The Department and the Project Team reviewed all of the comments and made adjustments to the Plan where appropriate.
- Comments were summarized, organized, and responses provided for each unique summarized comment.
- **178 unique comments, 34 page Comment/Response Document**
- Several comments resulted in direct alterations to the Plan. These are identified in the C/R document.
- DEP together with the Project team provided many detailed responses to the comments received.

Comment Period Overview

- Summary Categories
 - **19 Comments; Generally Supportive of Solar**
 - Solar and clean renewable energy are a source of jobs and economic value for Pennsylvania. (39 commentators)
 - Supports the Solar Future Plan and a statewide target of 10 percent solar generation. (13 commentators)
 - **13 Comments; Supportive of Specific Plan Elements**
 - Supports increased access to capital through solar lending products, low-interest loans, and access to PACE programs. (8 commentators)
 - Support for virtual net metering, community solar and other measures to increase access to solar. (6 commentators)

Comment Period Overview

- Summary Categories Cont'd
 - **12 Comments; Technical Comments and Recommendations**
 - The expiration of the Investment Tax Credit (ITC) provides a reason for urgency. (3 commentators)
 - Existing net metering limits of 50 kilowatt (kW) residential and 5 megawatt (MW) commercial owners acts as a disincentive to install solar. (1 commentator)
 - Supports the Solar Future Plan and a statewide target of 10 percent solar generation. (13 commentators)

Comment Period Overview

- Summary Categories Cont'd
- **21 Comments; Clarifications and Corrections**
 - Better explanation of the long-term contracts and how the strategy differs from the status quo. (2 commentators)
- **54 Comments; Recommendation for further study or additional strategies**
 - Perform a detailed analysis of cost-effective locations for solar expansion that accounts for the highest and best land use opportunities.
 - Now may be the time to review interconnection standards developed almost ten years ago.

Comment Period Overview

- Summary Categories Cont'd
- **11 Comments; Technical and Legal**
 - Identification that the 2008 study on rooftop solar potential is outdated and there may be greater potential.
- **18 Comments; Project Planning Process**
 - Does not appear that local governments were actively engaged in the stakeholder process.
- **25 Comments; Financial and Market**
 - The analysis of feasibility in the plan is incomplete with respect to its treatment of customer costs. (2 Commentators).
 - Alternative ratemaking must ensure just and reasonable rates based on cost causation.

Comment Period Overview

- Forward looking comments
 - 7 Comments for which in the response we pointed to the Strategy Support guide as a likely avenue for efforts.
 - More efforts to access to capital and lower interest rates for the residential and commercial markets.
 - Needs for a supplemental, graphic based, legislative information and action summary.
 - Additional work be completed to explain the legislative and regulatory changes required.
 - Explain the need for legislative reforms to enable utility ownership.
 - Identify and overcome the barriers to community solar that are currently in place.
 - Offering attractive loans to commercial customers (under 1 MW).
 - Provide municipalities guidance on how to expand solar.

Questions?