BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

Proceeding No. 13A-0836E

IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2014 RENEWABLE ENERGY STANDARD COMPLIANCE PLAN

STATEMENT OF POSITION OF

THE COLORADO SOLAR ENERGY INDUSTRIES ASSOCIATION

June 6, 2014

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INTRODUCTION

Pursuant to the Commission's rules of Practice and Procedure, Rule 1503, 4 C.C.R. 723-1, and oral order of the ALJ Adams at the May 2nd prehearing conference, the Colorado Solar Energy Industries Association ("COSEIA") hereby provides this Statement of Position addressing certain issues in Public Service Company of Colorado's ("PSCo" or the "Company") 2014 Renewable Energy Standard Application ("2014 RES"). The omission or exclusion of statements regarding other aspects of the 2014 RES Plan should not be construed as acquiescence or approval.

I. SUMMARY OF POSITION

COSEIA recommends generally maintaining the status quo for acquisition, pace and REC purchase prices in the 2014 RES planning cycle, in part due to a short one-year planning cycle.[1] COSEIA believes the solar industry in Colorado is maturing and is collectively planning for the sunset of Renewable Energy Credit ("REC") purchases for some portions of the Solar*Rewards ("SR") programs.

Aligning public policy with the market needs of the nascent solar industry will help all Coloradans. Since voters adopted Amendment 37, Colorado's solar industry has contributed $1.42 billion to the state's economy.[2] Solar employees have also earned more than $534 million

[1] *See*, Hearing Exhibit ("H.E.") 900, Wiener Answer Testimony, p. 2, ll. 6-8, and p. 5, ll. 10-15.
[2] H.E. 802, Wright Answer Testimony, p. 4, ll. 13-14.

since 2007.[3] Rooftop solar also minimizes water use for electricity generation, diversifies Colorado's energy resources, reduces the impact of volatile fuel prices, and improves the natural environment of the state.[4]

It is vital to a steady and strong Colorado solar industry to address program processes that in the past have left the industry with unnecessary and damaging stops and starts. Right now, the medium program has been idle since October of last year, and the small program capacity is exhausted for a second time. Recent efforts to restore these programs on an interim basis have not been successful as of the date of this filing. To this end, COSEIA recommends a capacity allotment that will last until the next RES plan is in effect.

COSEIA believes the "next era" of rooftop solar is coming, but is not here yet.[5] Incentives are still needed, and COSEIA's recommended incentive and capacity levels will have a positive impact on the RESA balance in the years 2016-2023 and no funds will need to be advanced to the RESA. REC purchase prices have now reached a level so low that it is prudent to seek broader reflection potentially through a new market study before dropping them any further.

Because of the need to address the damaging impact of program starts and stops on the industry, and combined with the fact that its plan has a positive impact on the RESA balance, COSEIA urges the Commission to accept its recommendation of 48 MW small, 24 MW medium (78.5 MW total) and reject the Office of Consumer Council's ("OCC") (12.5 MW) and the Company's recommended plans (42.5 MW total). COSEIA's recommended plan has the best chance of ensuring no stops due to lack of capacity and would alleviate the need to enter into

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[3] HE 802, p. 4, ll. 15-16.
[4] HE 802, p. 5, l. 16 to p. 6, l. 1; 4 C.C.R. 723-3-3651.
[5] H.E. 900, p. 4, l. 21 - p. 5, l. 2.

interim agreements between RES plans, thus providing the market security and potential for reduced program costs in the long-run.

The rest of COSEIA's Statement of Position provides more details on its recommendations and why its plan will avoid program gaps. It addresses the importance of slowing the pace of incentive decline, the importance of rolling over unused capacity, explains the differences in market segments, and the need for further study.

COSEIA's stated vision for Colorado's Million Solar Roofs -- a campaign to achieve deployment of 3 GW from all sizes of distributed and centralized solar energy projects by 2030 – will be advanced through this recommendation. COSEIA is confident that stakeholders can work together to bring good renewable energy policy to the people of Colorado and meet the declaration of intent set out in Amendment 37.[6]

II. STIPULATION IMPACT ON THE OCC PROPOSED PLAN

ALJ Adams has asked all parties to comment on the signed agreement between the Company, the Solar Energy Industries Association ("SEIA") and COSEIA,[7] and how that agreement might affect the OCC's proposal for 12.5 MW total (6 MW small and medium). On May 5, 2014, the Company applied to have the stipulation and settlement agreement approved. The stipulation and agreement would approve up to 20 MW (up to 4 MW/month) in the small program and up to 7 MW in the medium to be taken out of the capacity approved in this 2014 RES plan. The final order in this proceeding would supersede the terms in the interim stipulation and agreement.

[6] *See*, H.E. 900, p. 2, ll. 9-22.
[7] *See*, H.E. 1402, Verified Application and Attachment, Proceeding 14A-0414E

If the stipulation were approved and more than 6 MW of capacity were used before the 2014 RES plan was approved, that capacity would exceed the OCC's recommended 6 MW for the small and medium programs. COSEIA believes that the harm now being done to the solar industry because both the small and medium programs have stopped, halting work during the busiest construction time of the year, far outweighs any potential harm to the OCC. Furthermore, applying the statutory minimum capacity level that the OCC recommends would inflict further damage on the onsite solar industry. Not approving the interim program included in the stipulation, or approving the OCC's recommendations, would exacerbate the stop and start nature of the program, which could eventually lead to higher costs, and to which the Commission has already provided guidance to the parties in the 2012/2013 RES plan decision.

Decision No. R12-0261 in Proceeding No. 11A-418E rejected the minimum plan proposal from the OCC in the 2012/2013 RES plan and stated that:

> "In determining the level of on-site solar acquisition to approve in the Compliance Plan, it is critical to consider the short-term, as well as the long-term consequences of what is approved. Undoubtedly, the Minimum Plan will help keep costs in check and result in a lower RESA deferred balance, which will be reduced more quickly than the other two plans. However, whether the Minimum Plan will help sustain a viable and robust solar industry into the future is debatable. A robust market that remains viable in the long-term is crucial to keeping the costs of Retail DG and the cost of compliance with the DG requirements of the RES reasonable. Basic economic theory tells us this. Although the Minimum Plan appears cheaper now, the possibility of long-term cost increases is of concern."

Decision No. R12-0261, addressing 2012/2013 Plan exceptions also states:

> "We are also concerned that the adoption of the Minimum Compliance Plan for 2012 and 2013 may result in too few on-site solar acquisitions relative to recent trends, with potential adverse consequences to both ratepayers and the industry."

COSEIA fully supports the previous statements and has been advocating for a restart of the medium program, which has been exhausted since October 11, 2013 and advocating to prevent a stoppage in the small program, which ran out of capacity on June 4, 2014. (The Company is still taking reservations on a conditional basis, dependent on the outcome of the 14A-0414E, or this proceeding). COSEIA does not wish to argue the merits of the stipulation and agreement but notes that all signed parties believe that the agreement is in the public interest. For the foregoing reasons, COSEIA recommends that the OCC's recommended minimum plan be rejected. Their concerns once again miss the mark by not taking in the long-term view, and their position should not further delay the acceptance of the stipulation and settlement agreement, or the final decision in this matter.

III. COSEIA RECOMMENDS SOLAR REWARDS ACQUISITION AT LEVELS AND AT A PACE THAT IS SUPPORTED BY MOST RECENT MARKET ACTIVITY AND TO AVOID PROGRAM GAPS PRIOR TO THE NEXT PLANNING CYCLE.

COSEIA has recommended REC purchase steps of not less than 12 MW per step.[8] Small program acquisition is recommended at 48 MW with Customer Owned REC purchase prices to be no lower than \$0.03 and Third Party REC purchases to be no lower than \$0.01.[9] For the medium program, COSEIA recommends 24 MW starting at a REC price of \$0.06/kWh.[10] COSEIA has previously recommended the status quo in the Community Solar program, maintaining both a standard offer program at 3 MW with \$0.07/kWh REC purchase as

[8] *See*, H.E. 900, p. 9, ll. 6-10; and H.E. 901, Brinenberg Supplemental Answer Testimony, p. 2, ll. 18-22.
[9] *See*, H.E. 901, p. 2, l. 1, and *see*, Attachment JLB-1, Amended Revised Table 2.
[10] *Id.* at l. 2, and *see*, Attachment JLB-1, Amended Revised Table 2.

previously charted and a large Community program of 3 MW by RFP.[11] Further, COSEIA supports PSCO's recommendation for a 0.5 MW reserved allocation for community projects below 100 kW with a standard offer of $0.10/kWh REC purchase and recommends that program be designated as a pilot.

COSEIA's recommended acquisition levels are consistently higher than the Company's for two important reasons: 1) the growing number of solar customers causing increased monthly run rates of applications and installations and 2) helping assure continuation of the program through the 2014 RES planning cycle with capacity lasting until final adjudication of the next 2015-2017 RES Planning cycle.

IV. IMPORTANCE OF INCREASING SIZE OF STEPS AND SLOWING THE PACE OF DECLINING REC PRICES

Slowing the pace of declining REC prices and increasing the size of the steps is important to accommodate the growing number of solar customers and assure a stable marketplace for the industry from one RES Plan to the next. The problem of stops and starts is illustrated by the current situation the solar industry finds itself in - both small and medium programs are completely closed during the peak installation period of the year. In June 2014, we are still operating under the 2012-13 RES plan and amendment that was adjudicated in early 2012 and this time last year. The small program ran out of capacity four months into 2013 and the medium program ran out of capacity 10 months into 2013. As of June 4 this year, the small program has run out of capacity for a second time, and the industry's and utility's attempts to restart on an interim basis have not been approved.

[11] *Id.* at l. 3, and *see*, Attachment JLB-1 Amended Revised Table 5.

As long as unused capacity continues to be restored to the program, as is current practice, the actual total amount of acquisition would be somewhat less important than the pace of the program. Should acquisition amounts remain unsubscribed prior to approval of the next RES plan, unused capacity can simply be factored into the next acquisition plan. Therefore, COSEIA believes it is very important to enlarge all steps to at least 12 MW to slow the pace of the program during the final years of these REC incentive programs.

V. IT IS IMPERATIVE TO STABALIZE THE SOLAR MARKET AND PLAN SMOOTH STANDARD OFFER PROGRAMS THROUGH THE 2015 – 2017 RES PLAN WHEN FEDERAL SOLAR INVESTMENT TAX CREDITS ARE REDUCED.

It is imperative that the market achieves stabilization through the next approximately 30+ months and that our actions in this 2014 RES and decisions to improve our processes for the 2015-2017 RES plan account for the planned reduction of the Federal Income Tax Credit from 30% to 10% at the end of 2016. There are other variables to account for as well, such as the potential for higher costs of solar equipment, which are trending up after a period of dropping rapidly in recent years, and impacts from stronger federal energy regulation that could affect avoided cost calculations.

The collective record of projecting capacity and incentives from one planning cycle to the next has not relied on any precise metrics or formulas but rather comes from limited market information and judgment-based recommendations. In virtually every RES planning cycle, the industry has suffered from unexpected gaps in program availability. While the industry has at times been successful at reaching agreements approved by the Commission to bridge these gaps, this places strain on the Commission and parties, and is unfair to all stakeholders.

One or more mechanisms should be in place to alleviate these gaps and the resulting strain, such as: 1) Provide conditional approval of allocation in the event acquisition approved in a given planning cycle is insufficient to last until the next planning cycle. An example of this type policy was illustrated in COSEIA supplemental answer testimony, and would be Decision No. C13-0275, Docket No. 13V-0085E where the Commission approved conditional DG acquisition by PSCO after January 1, 2014 in the event the 2014 RES proceeding was not approved at that time;[12] and 2) Approve an acquisition amount large enough to meet the industry needs until the next planning period, while maintaining the condition that any unused capacity will roll over to the next planning cycle. In this way, while the next planning cycle is being adjudicated, any excess acquisition capacity can be factored in to those discussions, reducing gaps in the program. COSEIA believes its proposed total capacity of 78.5 MW will achieve this goal without putting an undue financial strain on customers or the RESA. Furthermore, because the impact of Solar Rewards acquisitions on the RESA balance is currently projected to be positive for all parties' proposals, including that by the Company[13] this means that retail DG systems installed under the 2014 RES Plan will have a positive impact on the RESA,[14] and the Company indicates the RESA balance will remain positive.[15] Thus there is no need to advance funds and there is no need to limit SR enrollment.

VI. THE IMPORTANCE OF RESTORING AND ROLLING OVER UNUSED CAPACITY FROM ONE PLANNING CYCLE TO THE NEXT

[12] See H.E. 901, p. 6, ll. 16-18.
[13] H.E. 23, Supplemental Direct Testimony of Robin L. Kittel, p. 10, ll. 4-7.
[14] *Id.* at p. 9, Table 2, l. 13.
[15] *Id.* at p. 12, ll. 1-3.

COSEIA strongly recommends that all incentive capacity not consumed in a designated calendar year should roll over to the next year. Furthermore, any expired reservation that fails to construct should be restored to the program upon expiration. These rules should be followed for all programs including small, medium, community, and large. Any other procedure unfairly reduces the amount of solar allocation that the industry has been approved by the Commission to deploy.

The Company's description of technical difficulties is neither compelling nor justified as a reason to not track and restore such capacity. As is the practice in many other states, the solar capacity approved by the Commission should be tracked in a transparent fashion, and that information should be available to the public. The data should show expired applications restored to each program and unused capacity from any given program rolling over to the next planning cycle.

VII. THE SUCCESS OF SOLAR*REWARDS IN GENERAL MASKS SIGNIFICANT PROBLEMS WITH SECTORS AND SPECIAL MARKETS OF THE SOLAR MARKETPLACE

COSEIA strives to provide industry insight intended to help in these proceedings by reporting on the health of various market segments of the SR program and also to spotlight issues or areas where changes in the program can better serve certain markets and sub markets. Also, there is danger in measuring apparent success in one part of the program and extrapolating to others. For example, Third Party Owned systems in the small program, since their introduction in 2010, have seen a dramatic increase in the market share through solar lease and PPA programs, and customer owned installations have seen a significant decline in market share.

Since the implementation of a 100% PBI REC purchase arrangement and combining Customer Owned Small acquisition with Third Party systems, COSEIA believes that the Customer Owned portion of the program currently suffers[16] and requires examination now or in future planning cycles to determine the best path moving forward as it may no longer make reasonable financial sense to attract participation by this market segment.[17] For now, COSEIA recommends moving forward with the status quo on incentives and increasing the capacity per step, until the next plan where these small program issues can be addressed.

Similar issues can be drawn from the medium program and the lack of a large program since 2011. The medium program has been closed since October of 2013. Using up all available capacity might be interpreted as a sign of health in that segment. In fact, COSEIA predicts that when this program eventually is re-opened, pent up demand will cause an initial brisk pace of reservations, which may erroneously be perceived as a sign of market health. Closer scrutiny, however, reveals problems due to low REC purchase rates that spotlight how this program's REC prices are insufficient to encourage increased customer sited solar generation for the many demand-based tariff customers in this program class as prescribed in the Colorado Renewable Energy Standard.[18] By virtue of their tariff rate, demand-based customers get a net metering offset more than 50% lower than non-demand-based tariff medium customers in the same class. While COSEIA acknowledges that net metering is being addressed in a separate docket, this particular nuance relates to a flaw in the application of REC pricing regardless of the outcome of the separate net metering discussions.

[16] H.E. 901, page 10, Line 16.
[17] *Id.* at p. 8, l. 14.
[18] C.R.S. 40-2-124 Section (e) (III).

These important market segments are examples of areas where greater scrutiny is needed as a matter of improving processes addressed in this plan resulting in better future RES plans. The Colorado RES statute states explicitly its goals to design programs and standard offers that extend participation to market segments that are otherwise not responding to existing standard offer programs.[19]

VIII. THE IMPERATIVE OF COLLECTING MARKET DATA TO BETTER FORMULATE APPROPRIATE REC PRICE LEVELS AND ACQUISITION AND TO IMPROVE FUTURE RES PLANNING.

Testimony and cross-examination from multiple witnesses during the hearings in this proceeding made it abundantly clear that more objective data is needed on the state of the market. The record including discovery filings includes instances where COSEIA and other parties are requested to indicate to what extent their testimony incorporates market surveys or market research, such as in Hearing Exhibit No. 1409.[20] The company acknowledged during cross-examination that determinations on appropriate acquisition levels and REC pricing levels are not based on an analysis of the market. At this critical time in the Colorado solar market, a more informed and scientific base of information is required. That is why COSEIA recommends leaving REC prices as they are today given a short REC planning cycle and pending the completion of a market analysis that can provide objective information on the current value of RECs.

COSEIA strongly recommends that a study be commissioned using RESA funds to study each category of solar deployment including important market subsets for guidance to all

[19] *Id.*
[20] H.E. 1409, COSEIA Response to Discovery Request PSCO 1-14.

stakeholders in the 2015 – 2017 RES Planning cycle. The Market Study could be contracted to an independent third party in coordination with the Company, COSEIA and its member companies, and others with results made available to all stakeholders. In addition to gathering and compiling primary and secondary market data on various segments of the solar market, the study should also survey trends in other states looking for market-based payments for RECs as Colorado transitions from the current system. An example of the type of study we suggest is the Colorado Agricultural Energy Market Research Report done by the Colorado Energy Office.

COSEIA understands that this is a new recommendation, but this particular issue is a forward looking measure designed to help the process in future proceedings and would not affect the decision on any issues in this 2014 RES proceeding. It is rather one of several specific process recommendations by COSEIA to be made in this 2014 RES that will improve future RES Plan proceedings. Furthermore, should the Commission defer review of this recommendation to the next 2015-2017 RES plan cycle, the next process would not receive the advantage of having the vital information that such a study could provide to help guide the outcome of that proceeding thus mooting its entire benefit - a benefit to every stakeholder, including the public, in these dockets.

The Market Study should inform the Commission as it considers future REC purchase levels. Since 2006, the principal market data and reasoning for recommending declining REC purchase amounts has been reference to national studies showing falling costs of solar panels over the past several years. Specifically PUC Staff member Bill Dalton explained during cross examination at hearing on May 8, 2014 in response to a question from the ALJ about Staff being concerned about paying higher levels of ratepayer-funded incentives that because the rate that solar panel costs declined was seemingly greater than that of the decline in incentives, that Staff was concerned that incentives were too rich.[21] We believe this is an over-simplification of a more complex market behavior. There has been little study in Colorado to track these costs or to correlate them with REC pricing. As mentioned before, there is evidence that solar hardware prices are now rising.

As referenced in Hearing Exhibit 300, Answer Testimony of William J. Dalton of Staff, a 2013 annual report by Lawrence Berkeley, Tracking the Sun Solar Industry, the cost of solar installations in Colorado is the lowest or second lowest of all active solar markets.[22] There are no dramatically different costs of materials, labor, or soft costs from one market to another. Therefore, the fact that Colorado has the lowest installed cost indicates that solar integration companies in Colorado must operate at lower business margins than installers in other markets. The result of this "choking" effect is a reduction in the number of viable companies offering services in the state, a lower "health" of the companies operating, a concentration of business among fewer providers, and higher risk of business failure.

This translates to less choice for consumers and business customers, and it threatens important economic development goals of Amendment 37. An important outcome of the Market Study recommended by COSEIA is guidance that can be provided to all stakeholders in the next 2015 – 2017 RES planning cycle with respect to program flaws and special under-served markets. At this stage of program maturity, we should be seeking to identify special markets, program enhancements and fixes of flaws in the program. Two such special markets referenced by WRA include commercial customers with demand based tariff rates and commercial and low-income residential customers.[23] Such a study could inform the Commission on a market

[21] *See*, Transcript Vol. II, Dalton Testimony, p. 134, l. 22 – p. 135, l. 23.
[22] See H.E. 300, Answer Testimony of William J. Dalton, p. 18, l. 9.
[23] H.E. 1005, Farnsworth Supplemental Cross-Answer Testimony, p. 6, ll. 3-9.

mechanism system such as proposed by The Alliance for Solar Choice to adjust REC Pricing based on market behavior. We believe that a Market Study will help shed light on these important future decisions.

IX: IN LIGHT OF THE RECENT ANNOUNCMENT OF THE COMPANY FOR SOLAR*CONNECT, FURTHER CAUTION IS RECOMMENDED IN DECISIONS REGARDING COMMUNITY SOLAR GARDENS.

In light of the Company's recent proposal to the Commission to build 50 MW of additional solar (Solar*Connect) in a format that to the market may be indistinguishable from Community Solar, there is even greater reason to examine this market and its broad reach in determining how large and with what stipulations this sector should grow in Colorado. Caution is recommended in examining overlapping market demands in this general sector. Thus approval of a market study can help shed light on this important emerging market sector.

X. WE RECOMMEND THE COMMISSION ADOPT A MORE SIMPLE RESOLUTION TO ADDRESS PSCO'S CONCERNS REGARDING CHANGE IN SIZE OF THE SMALL AND MEDIUM PROGRAMS.

The Company is proposing to change the size of the small program from an upper limit of 10 kW to 24.9 kW and a corresponding change of the starting limit of the medium program from 10.1 kW to 25 kW. The rationale for this change is that a higher rate of applications has been received for residential service above 10 kW but below 25 kW. COSEIA recognizes this market activity but believes it represents a temporary anomaly and an imbalance in REC pricing levels rather than a shift in the market. Larger residential systems can often "upsize" to reserve higher

REC pricing available to the medium program above 10 kW that better support the business case for residential solar.

COSEIA proposes a more direct solution to address this nuance by re-classifying the small program as "Residential" and at the same time re-classify the medium program as "Commercial" as is typical in most active state solar markets. This change allows several convenient and positive modifications to the Solar Rewards application / approval process as well as the fair and equitable treatment of these two separate and distinct classes of customers.

1. Currently the application process for medium program systems is clearly directed at more complex commercial site interconnection requirements. The engineering fee for small systems of $100, versus the fee for medium systems of $1000 is a further indication that the medium program was designed to serve commercial and not residential customers. The practice of placing this additional engineering cost burden on a larger residential interconnection (above 10 kW) is unnecessary, unintended and penalizing to that class of residential customer.

2. Separating the programs by <u>use</u> as Residential and Commercial rather than <u>size</u>, gives no application size constraint to either program that might unintentionally limit service to the customer class. For example, the Residential category could allow systems sized from 0.5 kW to 18 kW, while the Commercial category could allow sizes from 10 kW to 500 kW as always intended.

3. This categorization benefits and is supported by Rule 3655[24](f), which calls on the QRU to allocate RESA funds for retail renewables in proportion to RESA funds attributable to residential and non- residential sources. The Company would benefit from designation of Residential and Commercial in compliance with this Rule.

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[24] *See*, 4 C.C.R. 723-3, section 3655(f)

Finally, COSEA requests that this change be resolved using COSEIA's recommendation, which will also reduce or eliminate the issue presented above regarding a potential flaw in the medium program REC Pricing. The move from 10 kW to 25 kW for commercial customers almost entirely eliminates smaller commercial customers who are on non-demand rate tariff billing from participating in SR among their commercial peers.

XI. CONCLUSION

For the foregoing reasons, COSEIA urges the Commission to modify the Company's RES plan to follow COSEIA's proposed acquisition of 78.5 MW (48 MW small and 24 MW medium) as being justified and in the public interest. COSEIA also recommends larger, 12 MW steps. Wherever practical, COSEIA believes decisions in this short RES planning cycle should be guided by adhering to the status quo, while putting in place procedures and processes to improve future RES planning. REC pricing is currently so low that it is prudent to maintain pricing during this short planning cycle. COSEIA urges the Commission to heed the language in the previous decision, with respect to rejecting the OCC's "minimum" proposal, and again reject the OCC's recommendations.

COSEIA recommends restoring capacity not used back into the current step, and rolling over unused capacity from one Plan to the next. COSEIA points out that market success in one or more program segments, such as small program Third Party Owned, cannot necessarily be extrapolated to other programs. Extrapolation can instead cause policy to interfere with the best use of public funds to meet the needs of all appropriate markets. COSEIA recommends modification of the Company's proposal to change the small program limit from just installation size, 10 kW to 25 kW, to a system that differentiates via market class, residential vs. commercial.

Finally, COSEIA is confident that if the purposes and intent of Amendment 37 and service to the people of Colorado remain at the top of our priorities, that with this intent in mind, alignment can be found among stakeholders in this docket.

Dated this 6th day of June 2014.

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June 2014, **THE STATEMENT OF POSITION OF THE COLORADO SOLAR ENERGY INDUSTRIES ASSOCIATION** was e-mailed to each of the following:

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