



June 23, 2015

Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Dear Ms. Lee Eng Tan,

Standard Solar, Inc. (Standard Solar) is pleased to submit this letter in response to the Request for Comments issued on April 23, 2015. Standard Solar is a leading solar energy company specializing in the development and financing of solar electric systems nationwide. With more than 100 megawatts installed or financed since 2004, Standard Solar is one of the most trusted and respected solar companies in the US. Standard Solar operates nationally and is headquartered in Rockville, MD.

As summarized below, the following policies and/or programs would be most effective in promoting solar energy systems: allowing citizens to buy electricity from non-utilities, reforming interconnection procedures in the state, encouraging utilities to procure more supply-side solar, allowing aggregated net metering, and most importantly, maintaining Florida's current net metering program. Several other policies/programs would be instrumental in promoting solar energy systems that are outside the Public Service Commission's (PSC) jurisdiction. These include establishing a Renewable Portfolio Standard (RPS) with a solar carve out and eliminating the property tax associated with commercial solar development. Our discussion below focuses on the policies/programs within the PSC's control.

#### **Allowing Citizens to Buy Electricity from Non-Utilities**

Florida is one of only four states that prohibit citizens from buying electricity from anyone other than a utility. This prohibition limits customer choice and blocks the growth of solar energy. Standard Solar encourages the PSC to help facilitate a fair and open electricity market for all participants, whether by directly changing the current law through PSC action, supporting the planned ballot initiative, or supporting any future proposed legislation.

Standard Solar grew from a small company in 2004 to a national solar leader in 2015, with over 50 employees and hundreds of millions of dollars invested in solar projects throughout the US. Our success relies on a business model that allows citizens to buy electricity from non-utilities: over 75% of our developed projects would not have been possible under Florida's current electricity laws.

Standard Solar has identified Florida as a market for solar development. Our next-phase business goals will bring diverse income streams to new communities, and lead to the creation of new jobs throughout the US. However, it will not be feasible for us to develop solar projects in Florida on a large scale unless citizens are permitted to buy electricity from entities other than utilities. This is not restricted to only Standard Solar projects: thousands of other businesses are waiting to develop projects in Florida that will deploy capital and create jobs. We encourage the PSC to open the electricity market so that citizens can make their own choices about their electricity purchases.

#### **Interconnection Improvements**

We support the Interstate Renewable Energy Council, Inc.'s (IREC) comments related to interconnection reform. Effective interconnection procedures avoid unnecessary delays and costs. After developing



projects that required hundreds of interconnection requests, we have learned to avoid certain utility territories altogether due to their arduous and costly interconnection requirements. In contrast, we have focused millions of dollars of investment in certain areas in part because of their efficient and streamlined interconnection processes. Interconnection reform is a critical component of solar development. We encourage the PSC to develop fair, standardized interconnection policies that will support – rather than hamper – solar development.

### **Utility Solar Procurement**

While Renewable Portfolio Standards (RPS) are an effective tool in expanding solar utility procurement, there are other ways in which the PSC can encourage utilities to increase solar capacity. Open and competitive bidding processes, facilitated and encouraged by the PSC, will result in significant solar energy resource development procured in a cost-effective manner.

### **Aggregated Net Metering**

Aggregated net energy metering (ANM) is an important extension of any net energy metering policy (see last section for details on net metering). ANM allows a single solar facility to credit power to multiple meters. ANM is already available in many states throughout the US. Standard Solar has developed multiple ANM projects, including the first ANM project ever completed in Maryland, and a variety of ANM projects for municipalities. When ANM is utilized at the municipality level, every-day citizens benefit from an economic source of clean, renewable power. We support IREC's comments regarding best practices for incorporating ANM into Florida's current net metering policy.

### **Net Energy Metering**

We support IREC's comments regarding Florida's net energy metering (NEM) rules. NEM provides a simple and fair way to compensate solar users for the myriad of benefits that derive from increasing solar's penetration onto the grid. We agree with the 2014 Commission staff recommendation that NEM is critical to promoting solar energy systems, and we encourage the PSC to maintain their current NEM rules. At Standard Solar, we've seen firsthand how net metering policies influence projects. In Maryland, a state with strong net metering policies, we estimate that more than half of our public sector projects were economical because of NEM. NEM is a fundamental policy that has driven thousands of megawatts of solar capacity installations throughout the US. Standard Solar encourages the PSC to uphold Florida's existing NEM rules.

### **Conclusion**

Florida's solar potential is rated higher than many other states, but lags behind because of policy issues. Maryland, a state where Standard Solar has been and continues to be a leading solar developer, surpasses Florida in terms of solar capacity, investments, and jobs created, despite the fact that the state's solar resources are more limited than those available in Florida. In spite of resource constraints, Maryland had \$221 million invested in solar in 2014 according to the Solar Energy Industries Association (SEIA), compared with only \$63 million invested in Florida. What differentiates high solar capacity states such as Maryland from Florida is not solar availability, but rather, the existence of fair policies that promote solar energy systems, many of which are under the jurisdiction of state Public Service Commissions. Enhancing the development of solar technologies has substantial benefits for all citizens, and creates new and substantive revenue streams. Standard Solar remains interested in solar development in Florida, and is



poised to enter the market when some of these regulatory challenges are resolved. We encourage the PSC to address program and/or policy issues in a fair, transparent, and expedient manner.

Sincerely,

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