Hunt Alternative Energy Investments, LLC ABP Draft Guidebook Comments

Hunt recommends the "Co-location of DG projects" section on page 13 of the guidebook read as follows with changed language in *red italicized* text below.

> **"Co-location of Commercial DG projects**
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> The total capacity of *>10 kW* distributed generation systems enrolled in the Adjustable Block Program at a customer's location will be considered a single system. (For example, three 100 kW systems at a single location will be considered a 300 kW system.) For purposes of determining the system's REC price, a system's location is considered to be a single building (regardless of the number of utility accounts at the location) for rooftop installations, and a single property parcel for ground-mounted systems (if a property had both *commercial* rooftop and ground-mounted systems, it will be considered a single system). Additionally, systems located on multiple different rooftops *of commercial buildings* on the same parcel will be considered a single system if each system is owned by the same entity or its affiliates.
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> If two projects on one roof are separately owned and serve to offset the load of separate occupants (residential or commercial) of a building, then in order to have these arrays considered as two separate projects, an Approved Vendor must provide proof that the occupants are not affiliated entities and each has a separate utility meter and separate utility billing."

Our support behind the requested changes is presented as follows:

1. Original Intention - The original language in the section logically applies to campus style commercial customers who have multiple commercial buildings on one property such as hospital and university campuses. These intended campus style commercial customers have economies of scale in installation, permitting, equipment and labor that residential aggregations (<10kW per interconnection) do not. Projects that are an aggregation of ≤4-unit residential buildings (200+ units) do not exhibit these characteristics and would be unfairly burdened by being included with this apparently similar but distinctly different customer/project type.
2. Cost Structure - For projects that are an aggregation of ≤4-unit residential buildings, the most comparable per system cost structure of those outlined in Appendix D of the ABP's REC Pricing Model is in "Table D-1 -Residential Solar PV Installed Costs". Below are specific descriptions of the unique costs that make up this cost structure
    a. Resident Communications - design and implement a resident communication plan during the construction period. This includes Town Halls or community meetings, regular updates during constructions to individual residents and other stakeholders
    b. Permitting – Depending on who the AHJ is, these projects may have a process more similar to residential or commercial solar projects. If they have to undergo the residential permitting process, the permit review fees can easily get into the tens of thousands of dollars.

3. Interconnection - Projects such as these do not have an alternative method of interconnecting their rooftop solar arrays behind the meter. Since each residential structure has its own meter, each individual home is required to be an electrically separate project for interconnection purposes.
4. Consumption Offset - The generation of each individual solar array is offsetting consumption of each individual resident regardless if they are renting or owning the building
5. Industry Precedence - Solar Incentive Regulators and Program Administrators in other comparable jurisdictions such as SREC 2/SMART in MA and the Duke Energy Rebate program in SC have recognized the cost structure associated with these projects and have qualified each of the individual solar systems that make up these projects as residential in nature and allowed them to participate individually in the residential incentive programs.