



April 2, 2024

Senator Christopher Bray

Vermont Statehouse

115 State Street

Montpelier, VT 05633

cbray@leg.state.vt.us

Dear Senator Bray:

The elimination of nearly all group net metering and community solar projects, as proposed in H. 289, hurts local renewable energy development and removes the only direct access to solar energy for Vermont citizens and businesses without viable land for a solar installation.

I respectfully request that you remove or delay that proposed elimination from the bill at least until a new community solar program is in place. This would allow all Vermonters continued access to solar energy as they fight climate change and build their resilience for the future.

This change upholds the overall goal of the legislation for 100 percent renewable energy and retains the ability for local companies like All Earth Renewables to continue developing Vermont-based solar projects. Indeed, we have been one of the major builders of solar in Vermont over the last decade. Why introduce a change that greatly risks putting local solar companies and their employees out of business or forces them into other states at this critical moment in our energy transformation?

The negative impact on our businesses, not to mention on affordable housing developers, schools and non-profits would be significant. Companies such as Vermont Smoke & Cure, Bristol Bakery, Middlebury College, Mocha Joe's and the

Addison School District all benefit from offsite net metering. Why take that benefit away from small businesses now?

H. 289 effectively puts renewable energy development solely in the hands of the utilities. As you know, the coming electrification of our economy will create a large need for renewable generation just as Vermont's only other statutory renewable generation procurement program - the Standard Offer program- is winding down.

While AllEarth appreciates that H.289 has now evolved to recognize the importance of actual procurement and in Section 8 sets out a requirement for a report on a replacement program for group net metering, the interplay of that section with the rest of the bill has the incongruous result of that report not being due until after the ability to permit group net metering projects has expired.

Elimination of the above incongruity, and retention of the benefits of group net metering, can happen by simply removing H. 289's proposed changes to the "group net metering" and "net metering" definitions found in subsections (10) and (15) of 30 VSA § 8002. (See pages 2 and 4 of H. 289 in its current form.) This change preserves the opportunities that group net metering offers to renters, participants in future community solar arrays, affordable housing communities and other Vermonters who have no other meaningful solar energy access beyond what group net metering provides, and the legislature will of course be free to assess the desirability of any changes once the report has been completed. It will also allow time for the report to meaningfully evaluate the impacts of (1) the changes to the Public Utility Commission's net metering rule that became effective only a month ago, and (2) the July 1, 2024 biennial adjustment to net metering rates that takes place under that is already well underway.

Thank you for your consideration of this letter.

Sincerely yours,



David Blittersdorf

President and CEO

AllEarth Renewables, Inc.