



Save the Sound[®]
Action for our region's environment.

**Testimony of Save the Sound
Before the Committee on Energy & Technology**

In Support of

**LCO 3920, AN ACT CONCERNING EMERGENCY RESPONSE BY ELECTRIC DISTRIBUTION COMPANIES AND
REVISING THE REGULATION OF OTHER PUBLIC UTILITIES**

Submitted by Charles J. Rothenberger
Climate & Energy Attorney

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Save the Sound is a nonprofit organization representing over 4,200 member households and 10,000 activists statewide. Our mission is to protect and improve the land, air, and water of Connecticut and the entire Long Island Sound region. We use legal and scientific expertise and bring citizens together to achieve results that benefit our environment for current and future generations.

Co-Chairs Needleman and Arconti, Vice-Chairs Lesser and Allie-Brennan, Ranking Members Formica and Ferraro, and members of the Energy & Technology Committee:

Save the Sound is pleased to offer this testimony on the draft language for *An Act Concerning Emergency Response by Electric Distribution Companies and Revising the Regulation of Other Public Utilities*.

We appreciate your work on improving the reliability of the state's electricity grid while increasing utility accountability and advancing the state's environmental goals with LCO 3920. We especially appreciate the bill's expansion of eligibility for the micro-grid and resilience grant program, as well as the bill's recognition that adherence to our greenhouse gas reduction goals is a critical element of improving the reliability and resilience of our electricity grid.

This bill provides a good start to ensuring that Connecticut's electric utilities will be prepared to meet the challenge of the increasingly frequent storm events we can expect as a result of climate change, while also recognizing the need to support clean, reliable, and affordable electricity generation in a manner that leverages competition, reduces ratepayer risk, and achieves the state's environmental and climate goals.

But there are a few important and timely provisions that we would like to see added to this bill to make it even more effective:

Expand energy storage. Increased energy storage is essential to building resilience and reliability into our electricity grid. Coupled with rooftop solar, energy storage systems provide reliable backup power for customers when the grid itself is down.

While Connecticut has made some progress with respect to residential battery storage installations, according to the U.S. Energy Information Administration the total installed storage capacity is still extremely low, amounting to less than 1 MW.¹ Commercial energy storage systems in Connecticut appear to be practically non-existent.²

Prior to the unexpected and abrupt ending of the 2020 session of the General Assembly, this Committee had raised House Bill 53551, *An Act Concerning Certain Programs to Incentivize and Implement Electric Energy Storage Resources*. Among the provision of that bill was establishing a deployment target of 1,000 MW of energy storage by December 31, 2030, and directing PURA to establish programs and associated funding mechanisms for energy storage resources. We urge the Committee to include these robust energy storage provisions in the current legislation.

Recognizing the many benefits of distributed energy storage systems, a growing number of states, including Massachusetts, New York, and New Jersey have already enacted energy storage targets ranging from 1,000MW to 3,000 MW.³ Further, the Public Utilities Regulatory Authority has already begun an examination of battery storage and solicited proposals for energy storage program designs as contemplated by HB 5351, through its comprehensive grid modernization docket.⁴ Accordingly, this legislation should ratify Connecticut's energy storage targets to provide the foundation for the state's effort.

Expand the Residential Solar Investment Program (RSIP) to provide more economical solar options to homeowners and lower the burden on the grid. Like many sectors of the economy, the solar industry was negatively impacted by COVID-19, and expanding the RSIP program would provide the stability and support needed to ensure that we remain on track to more widely deploy solar and energy storage systems in the state. This is good for improving the reliability and resilience of the grid and is also a smart COVID-19 recovery measure.

The RSIP has been extremely successful, with 326 megawatts of residential solar PV systems having been approved as of June 1, 2020.⁵ Under the current 350 MW cap, the program is expected to be fully subscribed by the end of October, underscoring the need for timely action during the special session. We recommend expanding the program by an additional 100 MW (to a program total of 450 MW), which will provide for the program continuity that is essential to support our clean energy goals.

¹ See U.S. Energy Administration, *Battery Storage in the United States: An Update on Market Trends*, p. 22 (July 2020). Available at https://www.eia.gov/analysis/studies/electricity/batterystorage/pdf/battery_storage.pdf.

² Id.

³ Id., at 24.

⁴ PURA Docket No. 17-12-03RE03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Electric Storage. See Notice of Release of Final Requests for Program Design and Proposals, Attachment D: Request for Program Design Proposals (May 6, 2020). Available at <http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/af2a27a3f6ca294385258560005e0540?OpenDocument>.

⁵ Connecticut Green Bank, *Comprehensive Plan: Fiscal Year 2020 & Beyond*, p. 12 (revised July 2020). Available at https://ctgreenbank.com/wp-content/uploads/2020/07/Green-Bank_Revised-Comprehensive-Plan_062620a.pdf.

Maintain solar net metering until 2022. As with the expansion of RSIP and energy storage, maintaining the current net metering program for another year will provide stability to the solar industry and ensure predictability for homeowners looking to invest in clean, renewable technology. Given the other challenges facing the state, this would also allow PURA to focus on its grid modification efforts instead of trying to establish a new tariff program on the tight timeline originally provided. We believe that this is particularly important given the challenges that have been encountered in attempting to perform, on an incredibly expedited timeline, the statutorily mandated study of the value of distributed energy resources to inform the transition to a tariff-based system.⁶

Thank you for tackling these important issues, and for your time and consideration of this testimony.

Respectfully submitted,

Charles J. Rothenberger
Climate & Energy Attorney
Save the Sound
crothenberger@ctenvironment.org

⁶ See PURA Docket No. 19-06-29, DEEP and PURA Joint Proceeding on the Value of Distributed Energy Resources. Available at [http://www.dpuc.state.ct.us/dockcurr.nsf/\(Web+Main+View/All+Dockets\)?OpenView&StartKey=19-06-29](http://www.dpuc.state.ct.us/dockcurr.nsf/(Web+Main+View/All+Dockets)?OpenView&StartKey=19-06-29). See especially comments submitted on August 5, 2020 and August 27, 2020 on the Draft Study of Distributed Energy Resources in Connecticut (July 1, 2020).