STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re: Georgia Power Company's 2022 Rate Case Filing	))))	**Docket No. 44280**

POST-HEARING BRIEF OF GEORGIA SOLAR ENERGY ASSOCIATION ('GA SOLAR")

GA Solar respectfully submits its Post-Hearing Brief to the Georgia Public Service Commission ("Commission") and pursuant to the Commission's 2022 Procedural and Scheduling Order in that above referenced docket.

Introduction

The decision to expand the monthly netting program is a policy decision and at the discretion of the Commissioners. Significant rate increases of up to $350 per year for residential customers are expected over the next three years. A modest increase in monthly netting participation to 3% of the Company's total customer base, or 80,000 customers, would have widespread benefits, including creation of 2,400+ jobs, boost to Georgia's GSP, and meaningful annual bill savings. An expanded monthly netting program will enhance customer choice, offer a variety of system-wide benefits, and help mature the local rooftop solar market with further reduced PV

prices. All customers would benefit, with increasing distributed generation participation providing a range of direct and indirect benefits to customers.

Expanding net metering would promote equity across Georgia as well, and with intentional programming, even more of the benefits of an expanded monthly netting program could flow into these communities and provide a much-needed financial boost. A dedicated working group could coordinate financial support from sources such as IRA programs, ensure streamlined program administration, provide for workforce training, and help to educate and enroll customers, all in a place-based approach. This working group could also develop a rooftop PV consumer protections framework.

Recommendations

To realize the benefits of an expanded monthly netting program, including significant job creation, meaningful economic development impacts, and much needed saving to ratepayers as outlined above, GA Solar makes the following recommendations:

1) Customer and capacity limits on the RNR tariff's monthly netting provisions be lifted until the next rate case or until 80,000 customers are subscribed, whichever comes first.
2) Customers that installed solar after the 5,000-customer cap was reached be allowed to opt into the expanded program.
3) Reject the Company's request to force rooftop solar PV adopters onto a 3-part rate tariff be rejected, and that customers adopting rooftop solar continue to be permitted to choose their own service tariff.

4) A rooftop solar working group be formed to include the Company, PIA Staff, rooftop solar installers, community-based organizations, city officials, and others with the capacity to:
    a. contribute to defining and executing financial support, partnership, and place-based programming highlighted in this brief and further detailed in Kenneth Sercy's testimony, and
    b. that the same or similar working group be tasked with collaboratively developing reasonable rooftop PV consumer protections.

Discussion

The decision on whether to expand the monthly netting program has repeatedly been characterized in this docket as a policy decision.

When asked by Commissioner McDonald if comparing state net metering policies of other states to Georgia means it is a policy decision for the Commission, Company counsel, Hewitson, said "[t]hat is certainly something that you can read out of this, Commissioner McDonald,"[1]

On cross by PIA Staff, Company witness Gattie was asked, "[b]ut whatever the appropriate rate is, it sounds like you are just saying the Commissioners have to weigh policy considerations and made a subjective decision on that?" to which Gattie replied, "this is a policy decision."[2]

[1] Page 143, Line 3 of GPC Rate Case_Final Hrg_Day 2 - Transcript
[2] Page 738, Line 13 of 111022 GPC Rate Case - Day 3 - updated 112722

On cross by PIA Staff, Company witness Legg was asked, "would you agree that the task of striking an appropriate balance on this [monthly netting] issue is ultimately a policy decision for the Commission?" Legg replied, "Yes. Absolutely. And we've states it as such."[3]

Because expanding the monthly netting program is a policy decision, the Commissioners have the discretion in this rate case to balance the testimony of the parties and make a decision as to what is in the best interest of the ratepayers and the State of Georgia.

The Monthly Netting Pilot Program is a Success

The existing GPC monthly netting program available to up to 5,000 customers was fully subscribed in approximately 18 months. The program surprised many in how quickly it sold out and is widely considered a resounding success.[4]

The pilot program has driven installation of approximately 36.79 MW of customer-sited solar PV. More rooftop solar was installed in GPC territory since the monthly netting pilot began than in multiple decades before the pilot. Based on the data reported to the US Energy Information Administration ("EIA"), GPC had 5.4 MW of residential solar PV through 2019, which had grown to 21.5 MW of residential solar PV by 2021. This rooftop solar market activity has provided electric bill savings to thousands of GPC customers, helped drive local economic growth, and diversified the state's power grid.

[3] Page 531, Line 4 of GPC Rate Case_Final Hrg_Day 2 - Transcript

[4] Solar industry reps urge Georgia PSC to expand popular rooftop program, Georgia Recorder, July 1, 2021

The success of the pilot program implies high ratepayer demand more monthly netting capacity to help control increasing utility rates and save ratepayers money on their electricity bills. In polling made public earlier this year, 80% of all Georgians supported the expansion of the monthly netting program.[5] However, even with the market growth under the monthly netting pilot, Georgia has among the 19 lowest shares of rooftop solar in the country, including substantially trailing other 20 Southeastern states like Florida, Louisiana, South Carolina, Virginia, North Carolina, and 21 Arkansas.

Expanded Monthly Netting Will Create Jobs and Improve Georgia's Economy

Expanded Monthly Netting Will Create Jobs

The solar energy industry currently employs 5,341 Georgians. Georgia Solar Energy Association's testimony, authored with support from Kenneth Sercy, indicates that an expansion of the pilot program at 3% of the Company's total consumer base, or 80,000 customers, will add another 1,477 jobs directly to the State's solar industry, over a 25% increase, and 945 indirect jobs for a total of 2,422 new full-time equivalent jobs in Georgia.

Table 2: Net Economic Development Impacts of 3% Monthly Netting

	Direct	Indirect	Induced	Total
Employment	1,477	386	559	2,422
Income ($M)	286	66	93	445
GSP ($M)	93	30	199	322

[5] Poll: Georgians are concerned about electricity rate hikes and see solar as part of the solution., Georgia Solar Energy Association, July 5, 2022

Table 2 shows direct, indirect, and induced economic impacts of a monthly netting program reaching 80,000 residential GPC customers. This assumes an average PV system size of 6 kW, for a total capacity of 478 MW. This testimony also shows the same figures for 1% and 2% participation levels. Importantly, the average salary for solar industry jobs in the analysis present above is $59,000 assumed to last at least 4 years. Most of these are construction jobs by Georgians for Georgians that cannot be off shored to other states or countries.

Expanded Monthly Netting Will Improve Georgia's Economy

Using the same assumptions contained in Table 2 above, the economic impact resulting from an expanded monthly netting program is two-fold: job income and gross state product.

A. Income

Direct income is the salary compensation received by the workers in the jobs created. As indicated in Table 2, direct income resulting from an increase in rooftop solar PV installations amounts to $286 million. Direct income is attributable to technicians that install the PV systems onto customer rooftops as well as the management, administrative, and other jobs within the solar businesses that deliver rooftop solar to customers. The further ripple effect of indirect and induced incomes results in a income impact of $445 million annually to Georgia residents.

B. Gross State Product

Gross state product, or GSP, is the value-add of the goods produced by the economic activity that results from an expanded monthly netting program. For 80,000 participants or 3% of the Company's total customer base, an increase in GSP of $93 million is expected for the direct

activity that results from an expanded program and $322 million to GSP when taking into consideration the indirect and induced activity.

These are important jobs and economic development considerations that have informed past Georgia Public Service Commission actions – for example, earlier this year the Commission approved a motion on a biomass RFP in recognition of "…the benefits of biomass as a renewable resource, and in order to support Georgia's forest industry and rural job and economic development growth…"[6]

Expanded Monthly Netting Will Save Consumers Money on Electricity Bills

Rates are Projected to Increase through 2025

In this proceeding, the Company is requesting a $1 billion increase, a 12% increase to retail rates that would "result in an increase of approximately $16.29 to the monthly bill of a typical residential customer using an average of 1,000 kWh per month."[7]

Between the Company's rate case request in this docket and the potential approval of fuel balance expenses and partial costs of Plant Vogtle, residential customers may see an increase in base rates of more than $350 per year by 2025.

Expanded monthly Netting Can Help Consumers Control Increasing Rates

With rates projected to increase, in addition to external inflationary pressure Georgian's face at the grocery store and the gas pump, now is the time to give ratepayers more choices to control

[6] Georgia Public Service Commission Docket Nos. 44160 and 44161, Order Adopting Stipulation at 43.
[7] Direct Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson at 11.

increasing costs, not less. An expanded monthly netting program allows ratepayers to use rooftop solar energy to mitigate these increasing costs and do so in a sustainable way.

In Mr. Sercy's testimony, he modeled electric bill costs for a household consuming 1,000 kWh per month on the current GPC R-25 tariff, along with a second case where the household adds a PV system to offset approximately 50% of its grid consumption. Then, the bill savings was calculated for the household described above across the same program size assumed for the economic development analysis above; that is, 3% of GPC customers. The results equate to an average annual household savings of $937.

While these bill savings benefit customers installing rooftop solar, the entire GPC system benefits as well from reduced strain on the transmission and distribution grids, increased fuel diversity, and lower environmental and public health impacts (and thus lower utility regulatory risk) from the power system as more electricity is generated from small, distributed renewable systems.[8]

An Inclusive Expanded Monthly Netting Program Can Address High Electricity Burdens

The Commission has taken action to prioritize low- and moderate-income (LMI) communities with other programming such as HopeWorks, Residential Investment to Save Energy,

[8] Numerous studies have estimated system-wide grid, financial, and social benefits of rooftop solar PV. For examples see Hansen, Lacy & Glick. A Review OF Solar PV Benefit & Cost Studies, 2nd Edition (Rocky Mountain Institute, 2013). https://rmi.org/wp-content/uploads/2017/05/RMI_Document_Repository_Public-Reprts_eLab-DER-Benefit-Cost-Deck_2nd_Edition131015.pdf Many of the studies reviewed found rooftop PV benefits equal to or exceeding the local retail rate.

Manufactured Homes Program, and more recently an Income-Qualified Community Solar pilot program. An expanded monthly netting program designed to reach LMI communities would further build on past Georgia Public Service Commission actions to support LMI customers as the cost of energy continues to rise.

Across Georgia, there are more than 1 million households with an electricity burden greater than 6%, and more than 600,000 households with an electricity burden greater than 10%.[9] The median electricity burden in Georgia (currently 3.6%) is likely to rise as GPC rates increase.

In Table 3 below, adding a PV system with monthly netting has the potential to pull this family from nearly high electricity burden to below-average.

Table 3. Electricity burden with and without monthly netting for a 4-person HH at 100% FPL

Annual electric bill	$1,512
Annual income	$27,750
Electricity burden	5.4%
Annual elec bill w/monthly netting	$834
Electricity burden w/monthly netting	3.0%

A successful expanded monthly netting program design that includes a place-based approach, forging partnerships, and leveraging financial support can result in a program that will reach the LMI community and reduce electricity burdens.

A place-based approach to programming considers data on income, demographics, electricity burden, and other factors to strategically determine where and how to focus program

[9] Greenlink Equity Map data accessed November 2022.

resources and efforts. LMI communities will receive greater shares of program benefits if such location-specific considerations guide program implementation.

Forging partnerships such as community-based organizations, solar installers, Georgia Power, and state and local officials could be a powerful means of coordinating various financial support mechanisms, engaging with communities, and streamlining enrollment processes, all of which would support GPC customer access to an expanded monthly netting program, with potential to substantially boost LMI customer adoption of rooftop solar PV.

Leveraging financial support from the Inflation Reduction Act, for example, represents another opportunity to obtain federal funding in support of LMI customers realizing benefits from customer-sited solar PV. Multiple programs could be layered on top of one another to provide both direct incentives and financing to a wide range of low-income and disadvantaged communities. A broadly available monthly netting program would support elevated economic development impacts that would widen the potential for LMI communities to obtain jobs and increase household income through solar market growth.

Intentionally designing an inclusive monthly netting program that reaches larger numbers of LMI customers would enhance the level of program benefits accruing to those communities and further promote equity in Georgia.

Consumer Protections

A growing solar industry can attract a number of out-of-state marketers looking to “get rich quick” and potentially mislead consumers into making an uneducated purchasing decision. These out-of-state marketing companies are known to saturate the Georgia market with advertisements with misleading claims that can induce an unsuspecting customer to over pay

for a system that underperforms what is claimed. In addition, poor installation practices can mean serious trouble when interconnecting to the grid. A properly installed solar PV array will last over 25 years, but if the installer takes shortcuts or uses unqualified workers the system can be a fire hazard, cause roof leaks, or otherwise fail prematurely.

No entity in Georgia, public or private, has done more to address rooftop solar consumer protection issues than GA Solar. At gasolar.org, consumer protection information can be found that warns consumers of these bad actors and sales practices and offers guidelines on how to avoid becoming a victim. In the 2022 legislative session, GA Solar supported consumer protection bills that called for proper disclosures of material terms, informative consumer protection videos, and other measures designed to protect consumers. But more can be done if the monthly netting program is to be expanded.

While a rate case proceeding is not the proper forum to address rooftop solar consumer protection issues, GA Solar supports the Company's recommendation to develop a framework to recommend bad actors to the Consumer Protections division of the Attorney General's office. But reporting bad actors after the damage is done is not enough to protect consumers. In addition to developing this framework, a working group should be formed among the PSC Staff, the Company, and rooftop solar industry stakeholders to address consumer protection issues meaningfully and comprehensively on the front end before the Georgia consumers are harmed and without overly regulating the solar industry. GA Solar will gladly lead this effort should the Commission make consumer protections a part of it's decision in this rate case.

CERTIFICATE OF SERVICE

I certify that the foregoing **Post-Hearing Brief of Georgia Solar Energy Association ("GA Solar")** in Docket No. 44280 was filed with the Public Service Commission by electronic delivery on the 8th of December, 2022. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



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