

Northwest Regional Planning Commission
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Public Utility Commission Rule 5.100
Pertaining to Construction and Operation of Net-Metering Systems

Northwest Regional Planning Commission supports the examination and modification of Rule 5.100. In general, the proposed changes will enable a more efficient and predictable process for net-metering projects that conform to local and regional energy plans and implement the state's energy goals.

Proposed Changes to Preferred Sites Definition

- (1) NRPC questions whether it makes sense to incentivize the creation of new impervious surfaces for solar development, especially in areas with stormwater impairments.
- (2-6) NRPC supports the change to include pervious parking lots, clarify the time periods for existing development, and add specificity to the brownfields, landfill and earth extraction site definitions.
- (7) NRPC supports the elimination of the joint letter of support as a way of obtaining preferred site status.

NRPC does not write letters of support in regulatory proceedings, and neither supports nor opposes applications. Instead we analyze whether a project conforms with the regional plan. A "support letter" may connote a subjective value judgment rather than an objective assessment of consistency with plan policy. The existing language in this definition provides no guidance or standards for a municipal or regional planning commission to write this letter, and therefore is unpredictable for applicants.

NRPC would support adding an additional option to include *a determination from the legislative body and municipal and regional planning commissions that the site in question is a preferred site for solar energy development based upon the policies their respective plans*. It would be important to include language noting that this does not mean that the project is in conformance with the plan, and that additional comments may be submitted as the petition process continues.

Additional Questions Raised by the PUC

Preferred site status in constrained areas: NRPC has concerns about how net metering projects may exacerbate transmission constraints in the SHEI area. However, net metering projects are an important part of achieving the state's goals for renewable energy and greenhouse gas emissions. NRPC believes that further discussion and analysis are needed prior to determining whether preferred site status is appropriate for areas of the grid that are constrained. For example, the PUC could examine whether locational pricing or a requirement to reduce fossil fuel consumption should be necessary to obtain preferred site status in constrained areas?

Solar canopy over an existing parking lot: NRPC supports a simplified process for canopies over an existing parking lot, recognizing that parking must remain the primary use of the site. The canopy in question would be a structure built over a paved parking lot, therefore the PUC should recognize and support municipal rules regulating structures (size, height, placement) to ensure orderly development and consistency in application of those rules.