



**Washington  
Electric  
CO-OP**

# Washington Electric Cooperative

Comments on Revised H.716 before the House  
Energy & Digital Infrastructure Committee

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President**

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# Three parts of revised H. 716

- (1) Consider externalities of NM solar (lack of state and federal support, renewable workforce, rooftop location, grid benefits if paired with batteries) when setting adjustors.
- (2) Eliminate negative adjustor on behind-the-meter consumption of NM facility.
- (3) Create new adjustor for NM facilities paired with storage systems operated by Vermont electric utility or third-party storage/VPP provider

# 1. Consider External Effects on NM Solar

- Ratepayers are stressed as almost all electric utilities are experiencing rising costs.
  - Very concerned about cost of electricity
  - Further subsidization of net-metering to offset lack of state and federal support comes at further ratepayer expense.
- Federal actions have also hampered utilities in procuring renewable energy for customers.
- All other effects listed in revised bill already included for consideration in PUC biennial process
- The Renewable Energy Standard requires VT utilities to achieve stringent renewability measures, including in-state generation, within 4 years.
  - Utility-scale renewable energy is cheaper and likely faster to implement than numerous small rooftop solar arrays.
  - Experienced renewable installers are necessary

# The drivers of price changes are diverse

	Impact	Geographic Breadth
Replacement & hardening of aging distribution (and transmission)	 medium	Large
Extreme weather & wildfires: recovery and mitigation	 larger	Medium
Natural gas price variability	  larger	Large
Customer load growth	 medium	Medium
Utility-scale wind & solar (market based)	 medium	Medium
State Renewable Portfolio Standard policies	 medium	Medium
Net energy metered solar	 larger	Small

Source: Wiser et al, [“Factors Influencing Recent Trends in Retail Electricity Prices in the United States, October 2025.”](#)

## 2. Behind-the-meter consumption adjustor

**Separate adjustors for exported power and power consumed behind the meter could encourage less export of power.**

- Increases value of array to owner
  - Behind-meter compensation effectively at retail rate
  - If paired with local battery, can get additional benefit from time-of-use rate
- Reduces cost shift to other ratepayers

**Even if adjustor for power consumed behind the meter is eliminated, PUC still must have flexibility of setting adjustor for exported power to protect ratepayer.**

Example: Adjustor now  $-\$0.04$              $\$0.00$  for behind-the-meter  
Assume 80% exported       $-\$0.05$  for exported power

**Equivalent to Net Billing: exported power effectively compensated at lower rate**

At NH Electric Cooperative, retail rate is  $\$0.22/\text{kWh}$ ; credit for exported power is  $\$0.13/\text{kWh}$

# Conclusion

Small-scale net-metered systems no longer as relevant to resolving state's affordable energy and environmental challenges

Residential systems serving a single home or local group will still be of interest to many, and they can still be pursued.

- New adjustor structures in existing process may encourage local consumption of generated electricity.
- Not evident that electric ratepayer should remain the appropriate donor to support incentivization of continued net-metering program