

Subject: Re: [External] Bill S. 50

Here is my letter to the committee: Thanks in advance for your consideration.

Dear Representative James and fellow committee members--

We have lived in Vermont full-time for over 30 years and are new to solar. It was our intention to install a solar array for maximum benefit to all involved parties including the environment. We recently were in the process of constructing a new home in Vermont as well . As part of this project we opted for a solar installation. We also decided to use our local VT electrician as the installer. We were reassured that he would take care of all the "paperwork" with the Town electric department. To be honest, we had no idea that there even was paperwork that needed to be filed with the state as we were not presented with this and have not utilized solar before. As part of that process the paperwork was filled "on our behalf" but we were not consulted about any of the decision making about the paperwork, and any choices required in that paperwork. In addition, the email address and phone number placed on our application was that of the solar installer/electrician (not us) so if there was communication about this in terms of the application being accepted and/or timelines for revision/discussion, we, as the applicant, were unaware of any of that. I truly believe the installer was trying to be helpful. **We** received NO information from the state at all. This included no notices, etc to our address in here in VT. Approval of permits etc went to the installer alone.

The system permit came through in about March of 2023 but due to construction delays and issues with the hookup per the local electric utility, it did not go live until July 2024. It came to our attention only after the first month or two of receiving bills from the utility that there were charges for what appeared to be the renewable energy credits (RECs) that had been assigned for us to keep rather than to assign to the local electric utility which I am told is almost universal at this time. The invoicing was very complicated and took several visits to the utility to sort out as well. This was an error on the part of our installer and he fully admitted it and explained that it was an administrative mistake. A simple human error. The solar administrator at the utility advised us to reach out to the PUC and request a consideration to remedy the issue.

We submitted the letters of explanation and a request and it was denied as per Rule 5.127, as the assignment of the RECs is "irrevocable". I am sure the rule was put in place for good reason, especially in the setting of large commercial solar farms, etc but that is not the case here. The local utility has admitted to me it wants the RECs, we don't want or need the RECS, and the decision to keep them was made in error— a good faith mistake that was caught as soon as we realized what was happening.

We did not receive any chance to change this on an initial request or appeal to the PUC.

I run a small business in VT (community based medical practice) and our electrician also runs a small business—the types of businesses that VT is happy to have. This simple honest mistake will cost close to \$20,000 over the life of the system to our installer and seems pointless and unfair. The local utility wants the RECs to support their goal of getting to Net Zero and we wanted to contribute by investing in this green technology (the panels are not cheap as you know).

I appreciate your time in advance to hear my story and hope to get your support on allowing a one time change in the assignment of the RECs for small residential systems such as ours in order to allow by law the correction of a simple administrative error. **It is critical that no time limit** be placed on this as due to external factors, it could take months for the error to be discovered. Please include a "look back" provision if there is a time limit going forward to allow someone such as myself to correct an error even if we would not satisfy a time limit going forward as we have been working to correct this innocent mistake for 18 months. A full copy of any correspondence on this issue with the PUC etc. is available if helpful to the committee.

Respectfully,

Paul Unger