



Testimony of Robin Dutta on Behalf of SunPower Corporation
in Support of

LCO 3920 - AAC Emergency Response by Electric Distribution Companies and
Revising the Regulation of Other Public Utilities

with Necessary Amendments

Senator Needleman, Representative Arconti, Senator Formica, Representative Ferraro, and members of the Joint Committee on Energy and Technology:

My name is Robin Dutta, and I am the Director of Market Development and Policy for SunPower Corporation. SunPower is an American solar and energy storage developer, offering comprehensive energy solutions for residential and commercial energy consumers. SunPower has over 7,000 employees worldwide, the world's highest efficiency solar photovoltaic panel technology, growing development of solar plus storage projects, and an extensive national dealer network mostly consisting of locally-owned small businesses. In Connecticut, SunPower has 18 local companies in our dealer network, who develop and install residential and commercial projects, representing over 700 full-time workers in Connecticut. SunPower also has an operations facility in Newington that supports our residential business. We have over 3500 solar customers in Connecticut.

SunPower supports the intent behind the draft legislation, but strongly urges the committee to add provisions that were under discussion within the committee during the 2020 session prior to the COVID-19 shutdown. Those provisions include 1) the expansion of the Residential Solar Incentive Program ("RSIP") by 100 MW, and 2) the adoption of a target of 1 GW of energy storage by 2030. Taken together, these provisions have been vetted through a public hearing process, enjoy bipartisan support, and most importantly, further the goals of LCO 3920.

Background and Review of the Proposed Language

Clearly, consumers in Connecticut are unhappy with the performance of its EDCs. Recent storm events and the resulting extended outages, coupled with the EDC's proposed dramatic increases

in electricity rates, have left consumers frustrated by both the EDC's apparent lack of accountability to the ratepayers and by their own lack of alternatives as consumers with regard to energy costs and alternative resiliency options.

LCO 3920 attempts to address that frustration by proposing stronger accountability measures for the EDCs in reporting and performance, and by expanding and enhancing existing programs designed to provide ratepayers with additional choices. Sections One through Fifteen of the draft legislation establish new accountability standards for the EDCs' performance, along with penalties and rebates for their performance failures. Sections 17 and 18 impose new restrictions on third-party electricity suppliers, and Section 19 establishes new grant authority to DEEP for resilience proposals, particularly for low- and moderate-income communities. Section 20 calls for revisiting the terms of the NSTAR/Northeast Utilities merger to determine whether the promises of consumer protections resulting from that merger have been kept. Section 21 requires that an Independent Consumer Advocate be established within the board of directors of both EDCs.

Curiously, Section 16 appears to allow the DEEP commissioner expanded authority to determine, within the Integrated Resource Plan ("IRP"), whether to change Connecticut's existing policy of supporting renewable energy, energy efficiency, load management, demand response and distributed generation, and ultimately whether to withdraw Connecticut entirely from its participation in ISO-New England. Section 22 appears to empower the DEEP commissioner to approve, modify or reject the Conservation and Load Management Plan ("CLM"), and solicit proposals for the CLM from third parties, and to select such plan unilaterally. These are major departures from existing state policy, and SunPower believes such unvetted proposals should only be considered through a deliberative legislative process and are inappropriate for the committee's emergency legislation in a special session. Issues regarding grid modernization and the impacts of customer-generators to the grid, falls within PURA, and SunPower supports keeping these questions within their authority.

Proposed Additions to the Bill

Prior to the COVID-19 shutdown, the committee's work sought to achieve similar consumer-oriented goals to those proposed in LCO 3920, and like the draft legislation under your consideration now, the adoption of those provisions previously under consideration by the committee cannot wait until the 2121 legislative session.

1. Energy Storage

Specifically, H.B. 5351 proposed a state policy to encourage the installation of 1 GW of new energy storage installations by the end of 2030, and directed PURA to initiate proceedings toward establishing incentive programs design to achieve that goal. Though the bill was never voted on by the committee due to the COVID-19 shutdown, in fact, on May 6, 2020, PURA cited the language of H.B.5351 when it solicited proposals from interested stakeholders for new storage incentive programs to be adopted. Those proposals are now under review.

SunPower believes that there is no more powerful way to empower consumers than to provide them with energy storage options that shield them from the effects of power outages. Battery backup systems tied to residential solar installations provide resiliency options for homeowners as well as the ability to manage the power they produce on their own to mitigate high energy costs. Put simply, if the committee is serious about providing frustrated consumers with options and alternatives to their absolute reliance on the EDCs, it should not wait to adopt this fundamental policy to achieve that precise goal.

2. Residential Storage Incentive Program (RSIP) Extension

Of course, in most cases, residential storage is tied to residential solar. Yet the primary incentive designed to promote residential solar installations in Connecticut is due to expire later this month.

During the committee's deliberations in 2020, a consensus was reached that RSIP should be maintained until a successor program takes effect in 2022. Advocates argued that a 50 MW extension of RSIP would at least maintain the program into the 2021 session, and the Connecticut Green Bank, RSIP's administrator who originally opposed an RSIP extension, came to support an additional 100 MW of authorization through calendar 2021. In the end, everyone

came to agree that the continuation of RSIP through 2021 ensures that residential customers continue to benefit from the ability to produce their own onsite power until a successor program is established for 2022. Moreover, preventing the lapse of RSIP will maintain the solar industry jobs that Connecticut has fought hard to protect over the past few years.

As predicted, RSIP is nearing the end of its current authority, and without an immediate expansion of that authority, those jobs and those consumer choices will be lost at least until 2022. If the committee's intention is to promote electricity consumers' alternative choices, failing to reauthorize RSIP through 2021 will defeat that purpose. SunPower strongly urges the committee to authorize an additional 100 MW for RSIP as an integral part of its legislative effort to protect consumers by providing energy alternatives and resiliency options, and to protect those jobs that would be lost if RSIP is allowed to lapse for 18 months or more.

Sincerely,

A handwritten signature in black ink that reads "Robin K. Dutta". The signature is written in a cursive, slightly stylized font.

Robin K. Dutta
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SunPower Corporation
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