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April 6, 2022

Hon. Judith Williams Jagdmann  
Hon. Jehmal T. Hudson  
State Corporation Commission  
Tyler Building - First Floor  
1300 E. Main Street  
Richmond, VA 23219

**Re: VA Docket PUR-2020-00125**

Dear Commissioners' Jagdmann and Hudson,

We passed SB 629 and HB 1634 with bipartisan support in 2020 with the goal of creating a competitive shared solar program that provides customers who can't put solar on their roofs with an opportunity to participate in Virginia's clean energy transition. The legislation included a minimum bill component to allow for the recovery of reasonable costs of the program without undermining the primary intent to increase access to clean energy in the Commonwealth.

We are concerned that the Hearing Examiner Report (Report) issued on February 16 recommends a direction that contradicts the legislative intent to create a workable shared solar program in Virginia. Last summer, Dominion filed comments at the State Corporation Commission asserting that "program viability" does not constitute the "right benchmark by which to evaluate" the minimum bill.<sup>1</sup> We disagree with this interpretation and confirm here that we did not pass legislation to create a program that exists in name only. The Report acknowledges that the "record includes evidence indicating which of the minimum bill proposals are more (and less) likely to reasonably allow for the creation of Shared Solar Program generation"<sup>2</sup>, yet recommends a proposal that no party suggested or confirmed would achieve that result.

The minimum bill is required to help alleviate potential cost shifts associated with the shared solar program but should be implemented with an underlying assumption that the program needs to work. A competitive shared solar program is a new and exciting frontier for Virginia, and we recommend taking serious consideration of the input provided by industry and advocates with regards to what has proven successful in other markets.

We also urge the SCC to take prompt action on the small generator interconnection issue. We understand the SCC has publicly indicated that a docket will be opened to address this issue. It is our sincere hope that such a docket will be opened and resolved at all due speed and with comprehensive input from all sides.

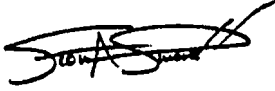
Addressing the challenges that solar developers across the Commonwealth face when attempting to interconnect with the utilities was a key legislative intent of our co-sponsored bills, SB 660 and SB 659, filed this session. The barriers to interconnection are some of the biggest

<sup>1</sup> <https://scc.virginia.gov/docketsearch/DOCS/4yln01!.PDF>

<sup>2</sup> Pg. 56 <https://scc.virginia.gov/docketsearch/DOCS/6l5z01!.PDF>

obstacles in deploying solar in Virginia and have real consequences for both solar customers and developers. Ultimately, the patrons removed the interconnection language in the bills in light of the SCC announcing that it was already opening a docket on the issue. As such, we are quite invested in the process. Any updates you can provide on the schedule for the docket and opportunities for stakeholder participation would be much appreciated.

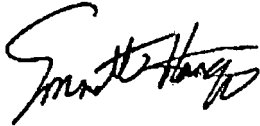
Thank you for your consideration of our comments.



Senator Scott A. Surovell  
36th District



Delegate Richard C. Sullivan Jr.  
48th District



Senator Emmett W. Hanger, Jr.  
24th District