

TESTIMONY OF HERMINA MORITA
CHAIR, PUBLIC UTILITIES COMMISSION
DEPARTMENT OF BUDGET AND FINANCE
STATE OF HAWAII
TO THE
HOUSE COMMITTEES ON
ENERGY & ENVIRONMENTAL PROTECTION
AND
CONSUMER PROTECTION & COMMERCE

MARCH 20, 2014
11:00 a.m.

MEASURE: S.B. No. 2934, S.D. 2
TITLE: Relating to Renewable Energy

Chair Lee, Chair McKelvey, and Members of the Committees:

DESCRIPTION:

This measure would add a new section to Chapter 269, Hawaii Revised Statutes ("HRS"), to authorize the Public Utilities Commission ("Commission") to establish community-based renewable energy tariffs by which utility customers who have invested in renewable energy generation facilities are allowed to receive payment from the utility for electricity produced by those facilities. S.B. No. 2934, S.D. 2, refers to a renewable energy facility "as defined under section 201N-1."

POSITION:

The Commission supports the intent of a tariff structure to enable new energy programs. The Commission would like to offer the following comments.

COMMENTS:

The Commission appreciates that this measure provides the Commission with supporting policy guidance – rather than prescriptive statutory provisions – for instituting new programs, like community solar projects, whose business models may not yet be mature. As technology and the renewable energy industry continue evolve, the Commission must maintain a level of administrative flexibility to address tariff changes through rules or orders, rather than through statutory amendments. The current Senate Draft 2 provides the Commission with that flexibility, while still providing some guidance in establishing community-based renewable energy programs. However, the Commission notes that including the definition of "renewable energy

facility” in this measure [page 1, line 18] in reference to HRS § 201N-1, Hawaii’s renewable energy facility siting process statute, appears to be unnecessary. Unless there is a compelling reason that the Commission is unaware of, the inclusion of this language is confusing and may actually be contrary to the intent of this measure.

The Commission offers a proposed House Draft 1 for the Committees’ consideration that was requested by the Chair of the Committee on Energy & Environmental Protection to (1) mandate the Commission to establish a community-based renewable energy tariff, (2) allow anyone to propose a project, (3) allow an electric utility to propose a project, and (4) standardize the tariff. These requested changes were incorporated into the proposed House Draft 1 along with clarifying amendments that address the concerns of the Commission.

Thank you for the opportunity to testify on this measure.

S.B. NO. 2934, S.D. 2
[Proposed H.D. 1]

A BILL FOR AN ACT

RELATING TO RENEWABLE ENERGY.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF HAWAII:

1 SECTION 1. Chapter 269, Hawaii Revised Statutes, is
2 amended by adding a new section to be appropriately designated
3 and to read as follows:

4 "§269- Community-based renewable energy tariffs. (a)

5 The public utilities commission shall upon application by an
6 electric utility or upon the commission's own motion, establish
7 a community-based renewable energy tariff or tariffs upon
8 determining that such tariff or tariffs are in the public
9 interest and are non-discriminatory.

10 (b) Anyone may propose a community-based renewable energy
11 project.

12 (c) An electric utility may develop and implement its own
13 community-based renewable energy project.

14 (d) The community-based renewable energy tariff and
15 related interconnection processes shall, to the extent possible,
16 be standardized.

S.B. NO. 2934, S.D. 2

[Proposed H.D. 1]

1 (e) For purposes of this section, "community-based
2 renewable energy tariff" means a tariff approved by the public
3 utilities commission by which electric utility customers may
4 purchase an interest conveying legal ownership in a portion or
5 portions of an eligible renewable energy project that is selling
6 electricity to the utility and allows an electric utility to
7 implement a billing arrangement to pay those customers for
8 electricity purchased by the utility."

9 SECTION 2. New statutory material is underscored.

10 SECTION 3. This Act shall take effect upon its approval.

S.B. NO. 2934, S.D. 2

[Proposed H.D. 1]

Report Title:

Public Utilities Commission; Community-Based Renewable Energy;
Tariff

Description:

Adds to Chapter 269, Hawaii Revised Statutes, a section that requires the Public Utilities Commission to establish Community-Based Renewable Energy Tariffs, as defined.

The summary description of legislation appearing on this page is for informational purposes only and is not legislation or evidence of legislative intent.



NEIL ABERCROMBIE
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TO THE HOUSE COMMITTEES ON
ENERGY & ENVIRONMENTAL PROTECTION
AND CONSUMER PROTECTION & COMMERCE

THE TWENTY-SEVENTH LEGISLATURE
REGULAR SESSION OF 2014

THURSDAY, MARCH 20, 2014
11:00 A.M.

COMMENTS OF JEFFREY T. ONO, EXECUTIVE DIRECTOR, DIVISION OF
CONSUMER ADVOCACY, DEPARTMENT OF COMMERCE AND CONSUMER
AFFAIRS, TO THE HONORABLE CHRIS LEE, CHAIR,
AND THE HONORABLE ANGUS L.K. MCKELVEY, CHAIR
AND MEMBERS OF THE COMMITTEES

SENATE BILL NO. 2934 S.D. 2 - RELATING TO RENEWABLE ENERGY

DESCRIPTION:

This version of the measure proposes to enable the Public Utilities Commission ("PUC") to establish community-based renewable energy tariffs to make the benefits of renewable energy more accessible to a greater number of Hawaii residents.

POSITION:

The Division of Consumer Advocacy ("Consumer Advocate") strongly supports the intent of this bill and offers the following comments.

COMMENTS:

Thus far, distributed renewable energy systems, such as solar photovoltaic

Senate Bill No. 2934 S.D. 2

House Committee on Energy & Environmental Protection

House Committee on Consumer Protection & Commerce

Thursday, March 20, 2014, 11:00 a.m.

Page 2

("PV") systems, have been available only to those who can afford the significant upfront cash payment that is required for system installation. A large segment of Hawaii's population has been locked out of this market for a number of reasons, including economic factors, living in multi-family dwellings, significant shading over their rooftops, and rooftop construction that does not allow for solar PV installation. Properly designed community-based renewable energy tariffs have the potential to provide significant energy cost-savings to this under-served market while not unfairly shifting cost burdens to non-participants. It also opens up access to affordable renewable energy to schools and community organizations that might otherwise be unable to participate in renewable energy self-generation programs.

S.D. 2 adds a definition to "renewable energy facility" by referencing the Hawaii Revised Statutes section 201N-1, which defines "renewable energy facility" as a "new facility located in the State with the capacity to produce from renewable energy at least two hundred megawatts of electricity; provided that an electricity production facility with a capacity between five megawatts and one hundred ninety-nine megawatts of electricity and a biofuel production facility . . . may apply to the coordinator for designation as a renewable energy facility." Therefore, under the definitions in HRS section 201N-1, a community-based renewable energy facility would be limited to new and very large facilities, excluding anything under 5 MW. The Consumer Advocate points out that this may pose siting difficulties for solar photovoltaic projects that seek to be a community-based renewable energy project. One MW of solar panels needs approximately five (5) acres of land area. The Consumer Advocate therefore recommends that the legislature adopt SD1 or the proposed version of this bill offered by the PUC.

The Consumer Advocate strongly supports the intent of this bill. The Consumer Advocate prefers a version of this bill that provides the PUC full discretion over key terms of the tariff, such as pricing, the treatment of bill credits, or other charges, as opposed to prescriptive legislative language that might result in unintended consequences. By establishing legislative guidance, without specific reference to costs and pricing terms, this allows the PUC to implement a regulatory process that would allow for input from all interested and affected stakeholders to develop the appropriate tariff or tariffs through an open and transparent process.

Thank you for this opportunity to offer comments.



HOUSE COMMITTEE ON ENERGY & ENVIRONMENTAL PROTECTION

March 20, 2014, 11 A.M.

Room 325

(Testimony is 5 pages long)

TESTIMONY IN STRONG SUPPORT OF SB 2934 SD2 SUGGESTED REVISIONS

Chair Lee, Vice Chair Thielen, and committee members:

The Blue Planet Foundation strongly supports SB 2934 SD2, establishing a community renewables program to expand the number of Hawai'i residents who can participate in the benefits of clean energy. This measure would allow residents to benefit from solar and wind energy systems—even if those systems are not sited on their property.

While Blue Planet requests that this committee advance this measure, we strongly recommend that the SD2 be amended to include key elements from the original measure. Those key elements are 1) directly establishing a community renewables program (instead of waiting for uncertain future action); 2) ensuring a broad, market-competitive program where any eligible party can propose community renewables projects; and 3) exempting the utility, such that the utility may establish its own community renewable program if it so desires.

Community Renewables can help to ensure that renewable energy is accessible for many Hawaii residents, businesses, and agencies who cannot currently take advantage of energy cost savings available from solutions like rooftop solar photovoltaic energy. Community-based renewable energy boosts private investment in our green energy infrastructure while it maximizes the flexibility of our clean energy solutions. In doing so, it benefits all Hawai'i residents by reducing the amount of money we send out of the state to pay for imported fossil fuels.

Community Renewables in the original version of SB 2934 better ensures equality and opportunity

The original version of SB 2934 is preferable to the current draft in three key ways. First, the original version **enables anyone** (a community group, a renewable energy developer, a land or building owner, etc.) to propose a community renewables project not just the electric utility. Any

proposal would remain subject to approved interconnection requirements to ensure safety. An open program will truly enable the democratization of our renewable energy resources and will allow market-competition to lower the cost of energy for ratepayers.

Second, the original version of SB 2934 **directly establishes** a program and provides guidance on how the program should function, ensuring that any subsequent regulatory processes occur within a policy framework for a fair and broad program. As currently written, SD2 would not result in the creation of a community renewables program until uncertain future action occurs.

Finally, the original bill makes it clear that the legislation will not preclude an electric utility from developing and implementing their own community renewables program without legislation—it simply establishes a framework for *others* to develop projects and **broaden the competitive landscape**.

Hawai'i households, businesses, and public agencies need a Community Renewables program because our current system leaves many unable to participate directly in the full spectrum of renewable energy options

Tens of thousands of Hawai'i ratepayers have been able to use solar power and other technologies to break free from energy costs being driven upward by fossil fuels. Unfortunately, many individuals and households are currently unable to directly participate in renewable energy because of their location, building type, access to the electric utility grid, or other impediments (although it must be noted that all ratepayers are benefitting from more renewable energy on the grid as a hedge against fossil fuel volatility). For example, (a) it may be difficult for a single **condominium** dweller to install solar panels, without a wider installation on behalf of the entire condominium; (b) it may be difficult for a **homeowner** to install solar on a shaded roof or within a saturated circuit; or (c) it may be difficult for a **renter** to persuade the landlord to install solar power. **All of these situations can be addressed with community-based renewable energy.**

Community Renewables unlocks renewable energy solutions, improves our economy, and benefits our electrical grid

Community Renewables allows residents to join together to find energy solutions. For example, several condominium owners in different buildings may collectively install solar panels in another location with spare rooftop capacity. Even larger communities can join together to install renewable energy in ways that are most effective and efficient for their particular community. Or public agencies, such as schools, colleges, universities, and local governments will have more

flexibility to access renewable energy across their systems. The cost savings can benefit important educational programs, social services, and new hiring.

Community Renewables can also help make our energy system more robust, by evening out the distribution of renewable energy on the grid. For example, homeowners on a crowded circuit can install solar panels on another circuit, and receive the credit against their energy bill. By promoting renewable energy on under-utilized circuits, it can help the utility operate our electrical system more effectively and efficiently. In addition to these benefits, group net metering creates new construction jobs, stimulates the economy, reduces emissions of greenhouse gases, promotes energy independence, and will assist in meeting and exceeding the state's clean energy goals.

Community Renewables is spreading across the country—don't let Hawai'i fall behind

Community Renewables is an innovative solution that is already happening in at least ten other states, such as California, Colorado, Massachusetts, Washington, Maryland, and Maine.¹ There is no reason Hawai'i shouldn't enable its residents to do the same thing.

For all of these reasons, it is in the public interest to promote this type of broader participation in renewable generation by Hawai'i residents, public agencies, and businesses. For many homeowners with large roofs, solar electricity is a no-brainer. But for many residents, solar power is simply out of reach because of roof space, circuit saturation, or other issues. The policy proposed in SB 2934 SD2 brings more social equality to our clean energy policy. Everyone should be able to access the full spectrum of renewable energy options.

Further, failure to act on this policy in 2014 means that the majority of Hawai'i residents will have to wait another year (or perhaps longer, if a lengthy regulatory process ensues) to directly participate in the benefits of renewable energy. Such a delay means that these residents and businesses will unlikely be able to take advantage of the 30% federal tax credit which is scheduled to sunset at the end of 2016. This means that those who have been left out of the distributed renewable energy boom will be further disadvantaged by being potentially locked out of federal tax benefits.

¹ The U.S. Dep't of Energy's National Renewable Energy Laboratory has reported on elements of these programs, <http://www.nrel.gov/docs/fy11osti/49930.pdf>.

The following pages contain an “FAQ” on community renewables and a supporting article from Pacific Business News.

Community-based renewable energy FAQ

Q: Why is community renewables necessary?

A: While solar has been an incredible success story in Hawai'i, the majority of residents simply cannot directly participate in renewable energy because of their lack of access to a suitable rooftop for solar, such as many of the 40% of residents who live in multi-unit housing such as condos, or those whose roofs are shaded or otherwise incapable of supporting solar. Community-based renewable energy allows residents to invest in and benefit from solar and wind energy systems—even if those systems weren't directly on their property. It's a matter of fairness and equality.

Q: What are the benefits of community renewables?

Aside from making Hawai'i's clean energy policies more equitable, community renewables can bring real economic value to those who need it the most. Under California's Multifamily Affordable Solar Housing program (established in 2008, now with 7 MW installed, and 13 MW signed up), community renewables is estimated to save low-income households 30% on their electric bills.

Q: Is anyone else doing community renewables?

A: Yes, as of November 2010, utilities, public utility commissions, and communities in California, Florida, Arizona, Utah, Colorado, Washington, Vermont, Massachusetts, Maryland, and Maine had all taken steps to adopt innovative community renewables programs. According a report by the U.S. Dep't of Energy National Renewable Energy Laboratory (NREL), the Interstate Renewable Energy Council (IREC) examined “the various community solar approaches that have been implemented thus far,” to develop “model” rules for community based renewable energy programs. These model rules could be used to develop a program for Hawaii.

Q: Aren't there other approaches to solve the same problem of lack of access to renewable energy?

A: Yes, there are, such as a utility-sponsored “green pricing” program. But this is not available in Hawai'i and there are no current plans to make such a program available. Moreover, a community-based renewable energy program would empower residents to take control of their energy situation with their own resources, leveraging the efficiency of efficiency of the market.

OUR VIEW

Solar gardens can make everyone a winner

PBN

A proven technology that is gaining popularity on the Mainland deserves some serious consideration here in Hawaii,

where the sun is part of our brand identity.

The concept is especially important on Oahu as we grow upward with high-rise condominium towers that offer their residents few options for renewable energy.

We're talking about community solar gardens, which enable businesses and residents to invest in renewable energy by subscribing to a solar electric array that is connected to the utility grid. Subscribers will then receive a credit on their electric bills.

Solar energy has been one of Hawaii's fastest-growing industries during the past decade, helped in large part by federal and state tax credits. Even so, its market penetration is under 10 percent.

One of the problems is that approximately 40 percent of Hawaii residents live in multifamily households, many of them without enough roof space to accommodate renewable-energy equipment. There also are economic barriers in rental units where tenants would reap the benefits while landlords pay for the equipment.

Community solar gardens would remove some of those barriers.

The Blue Planet Foundation, which introduced legislation last year, calls it a win-win-win proposition.

"Households everywhere can win by accessing affordable clean energy," the foundation says. "The utility wins by adding another tool to solve energy-interconnection questions. And businesses win because they can access a market that has long been cut off."

Hawaiian Electric Co. also likes the concept, according to spokesman Peter Rosegg.

"We are looking for a model for customers who want to invest in and benefit from solar PV but do not have the opportunity because they are high-rise residents, home renters or other reasons," he said. "The model should also offer potential lower-cost renewable energy and economic benefits for all our customers, not just those investing in community solar or single-family homeowners who can benefit from solar on their own roofs."

As one would expect, solar contractors also think it's a great idea. It would mean more business for them and expand solar's reach.

So, what's stopping us?

The Blue Planet Foundation's House Bill 1363 attracted some attention in the 2013 Legislature, but it was one of those complicated issues whose "time had not yet come." The foundation will submit a new draft this session.

We think the time has come to give community solar gardens serious attention. In our bid to rely more on renewable energy and less on fossil fuels, here's a concept that holds promise to move us in the right direction.

Testimony before the
House Committee on Energy & Environmental Protection
and
House Committee on Consumer Protection & Commerce

S.B. 2934 S.D. 2– Relating to Renewable Energy

Thursday, March 20, 2014

By Keiki-Pua S. Dancil, Ph.D.
Director, Business Strategy Development
Hawaiian Electric Company, Inc.

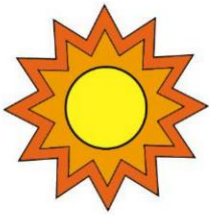
Chairs Lee and McKelvey, Vice Chairs Thielen and Kawakami, and Members of the Committees:

Hawaiian Electric Company and its subsidiaries, Maui Electric Company and Hawaii Electric Light Company, support S.B. 2934 S.D. 2 which establishes a community-based renewable energy tariff (CBRET) to be applied to services provided to customers by an electric utility for the purpose of encouraging the widespread adoption of cost-competitive renewable energy technology.

Hawaiian Electric and its subsidiaries support options for ALL residential customers; a community-based renewable energy program is just one of the many options that will increase access of clean energy to Hawai'i residents. There are several different models of community-based renewable energy programs, all of which are intended to provide greater access to customers who want to invest in and benefit from solar PV but who may not have the opportunity to install PV at their residences, such as residents of high-rises. We are interested in exploring a community-based renewable energy program model that offers the potential for providing lower cost renewable energy and economic benefits to ALL customers (not just those investing in a community-based renewable energy project) that can be safely and reliably integrated into our grid.

Hawaiian Electric and its subsidiaries request that this measure, S.B. 2934 S.D. 2 move forward as proposed.

Thank you for the opportunity to testify.



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Testimony of Inter-Island Solar Supply
In Support of SB 2934, SD 2
Before the Joint House Committees on EEP & CPC
Thursday, March 20, 11:00 a.m.

Chairs Lee and McKelvey, Vice-Chairs Thielen and Kawakami and members of the committee, my name is Richard Reed and I am the president of Inter-Island Solar Supply. We strongly support SB 2934, SD 2.

This forward looking bill addresses a clear problem: unequal ratepayer access to the monetary benefits associated with DG and NEM. A high percentage of Hawaii ratepayers presently have no control over their utility costs because of the nature or location of their residence or business. SB 2934, SD 2 is intended to redress this problem by establishing a mechanism whereby individuals or businesses can own a piece of a large wind or PV project sited on another property or rooftop. The devil, of course, is in the details, but we have faith that the PUC will be up to the task of adjudicating the envisioned docket in a fair and timely manner.

Hawaii's ratepayers love NEM and DG. They have seen what Grid Version 2.0 will look like and are no longer tolerant or accepting of the status quo. Hawaii's ratepayers want options to reduce their electric bills and they want them now. This is clearly evident in the public angst over HECO's September 6, 2013 decision to slow the pace of NEM and DG on Oahu because of the publicly stated concern over the "safety and reliability" of the grid.

SB 2934, SD 2, if properly implemented, will cleave together utility scale projects and DG such that big and small projects move forward at the same speed and scale and allow all ratepayers to share in the financial benefits offered by renewable energy. In short, neither large utility scale projects nor DG should be allowed to disproportionately dominate the interconnection and generation landscape. Ratepayers that want to take advantage of renewables should be allowed to do so whether the equipment is deployed on one's own home or business or sited elsewhere.

Thank you for the opportunity to express our preliminary views on this important legislation.

Aloha Chairs Lee and McKelvey and members of the committees:

My husband and I strongly support an amended Senate Bill 2934 to establish a community renewables program for Hawaii that is open to all participants. We are aware that about 40% of Hawaii residents are currently unable to benefit from solar power because they live in condos or apartment buildings, they are renters, their home doesn't get enough sun exposure, or their home is on a saturated circuit. We are among those who cannot benefit from solar power even though we have attempted to do so.

Community solar allows these residents to invest in off-site solar generation that can turn into direct reductions on their electricity bills. Besides cost savings, this program would also create new construction jobs, stimulate the economy, reduce carbon pollution, and help end Hawaii's dependence on fossil fuels. We believe everyone has the right to benefit from solar energy. This measure will enable access and fairness for all.

We encourage you to please vote in favor of an amended SB 2934 to establish community solar for all.

Mahalo

Marilyn and Gregg Lizenbery

Dear Chairs Lee and McKelvey and members of the committees:

I strongly support an amended Senate Bill 2934 to establish a community renewables program for Hawaii that is open to all participants.

Aloha,

Douglas A. Codiga

Aloha Chairs Lee and McKelvey and members of the committees:

I strongly support an amended Senate Bill 2934 to establish a community renewables program for Hawaii that is open to all participants.

About 40% of Hawaii residents are currently unable to benefit from solar power because they live in condos or apartment buildings, they are renters, their home doesn't get enough sun exposure, or their home is on a saturated circuit. Community solar allows these residents to invest in off-site solar generation that can turn into direct reductions on their electricity bills.

Besides cost savings, this program would also create new construction jobs, stimulate the economy, reduce carbon pollution, and help end Hawaii's dependence on fossil fuels.

I believe everyone has the right to benefit from solar energy. This measure will enable access and fairness for all.

Please vote in favor of an amended SB 2934 to establish community solar for all.

Thank you,

J. & Erica Grissmerson

To Whom it May Concern,

I am writing in support of SB 2934. I feel that those who live in condos, as I do, should be able to access solar power despite the constraints of our buildings. Establishing community solar programs would not only give us access to solar power but also reduce our electric bills in the long run while reducing our dependence on oil driven power. As our representatives you have a responsibility to, IN THE LEAST, create the conditions that provide fairness and equality in all matters to include access to energy.

Thank you,
Chris Kim

Christopher A. Kim

Contractor

Scenario Design Consultant

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SB2934

Submitted on: 3/18/2014

Testimony for EEP/CPC on Mar 20, 2014 11:00AM in Conference Room 325

Submitted By	Organization	Testifier Position	Present at Hearing
regina ponce	Individual	Comments Only	No

Comments: March 18,2014 To:Senate From:Regina Ponce Subject:Support of Senate Bill 2934 My name is Regina Ponce and I am a Sophmore at Pearl City High School. I am in support of the SB2934. I think that renewable energy is a good way for Hawaii to use its natural resources like the sun. Hawaii should consider renewable energy tariffs and allow more options for renewable energy. I myself can benefit from this bill. I have ideas on expanding the use of renewable energy across Hawaii and this bill can help that idea become a reality. Thank you for listening and please consider passing SB2934

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Aloha Chairs Lee and McKelvey and members of the committees:

I strongly support an amended Senate Bill 2934 to establish a community renewables program for Hawaii that is open to all participants.

I am a renter who does not have access to solar electricity. Community solar allows residents like myself to invest in off-site solar generation that can turn into direct reductions on their electricity bills. Besides cost savings, this program would also create new construction jobs, stimulate the economy, reduce carbon pollution, and help end Hawaii's dependence on fossil fuels. I believe everyone has the right to benefit from solar energy. This measure will enable access and fairness for all.

Please vote in favor of an amended SB 2934 to establish community solar for all.

Mahalo!

Julie Wing Shan Suen

LL.M. Candidate | Class of 2014

William S. Richardson School of Law | University of Hawai'i at Mānoa

To whom it may concern:

I support SB 2934 SD2.

Mahalo,

Tim Bowden

SB2934

Submitted on: 3/19/2014

Testimony for EEP/CPC on Mar 20, 2014 11:00AM in Conference Room 325

Submitted By	Organization	Testifier Position	Present at Hearing
David Atcheson	Individual	Support	No

Comments: I support the passage of SB2934 SD2. I am among the many renters who would like an approved framework within which to participate in community solar projects. While reducing my electric bill is a nice potential benefit, my primary motivation would be to help Hawaii become more resilient and less reliant on fossil fuels to generate electricity. The cooperation among neighbors that would be fostered by SB2934 could also lead to cooperation on other projects that can strengthen our communities. Should this bill become law, I have already identified a potential location to evaluate for a community solar project. Thank you for your consideration.

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I want to express my strong support for SB2934 – this bill is needed to ensure that the State of Hawai‘i makes progress on the use of alternative energy sources, especially solar. I serve as a board member of the Blue Planet Foundation and support these efforts. Mahalo – Virginia S. Hinshaw

SB2934

Submitted on: 3/19/2014

Testimony for EEP/CPC on Mar 20, 2014 11:00AM in Conference Room 325

Submitted By	Organization	Testifier Position	Present at Hearing
David Atcheson	Individual	Support	No

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