

I can only speak to residential. As a solar rep for United Better Homes, this is the basis of my expertise.

REG

The RE Growth program is a sham! To lock the homeowner into a sell price for 15 years, but allow Narragansett Electric (or whatever they call themselves these days) to charge whatever they want was a bad deal for solar customers since its second year. It was only a matter of time before *Rhode Island Energy* would be charging more than 29¢. This is why I have NEVER put a solar customer on REG.

The only salespeople who would suggest it, either A) don't realize how the program is flawed, or B) they want to offer higher first-year savings than a sales rep can with Net Metering. (I'm not sure which of those two is worse.)

Suggestions:

- Scrap REG altogether, and put the money into something else, or
- have a program like Massachusetts' SMART program, where the solar customers get $_c/kWh$ more than the retail rate of electricity "faw eva!"

REF

I call the REF program *The Rhode Island Lucky Solar Lottery Day*, because:

- You have to wait (months) for the drawing
- The panels cannot be installed before a grant is awarded
- Only a lucky few get anything — and those who win can win big! The post-tax equivalent of \$10,000!
- Once the jackpot is depleted, the losers are encouraged to play again (by waiting a few months)
- And will those losers be first in line for the next round? Nope!
- It's first come first served, right? Nope!
- Contestants win by submitting their applications time-stamped 1 second after the opening bell, according to CommerceRI's mail server.
- If the application is submitted 1 second before the opening bell, the application is void
- And you are only eligible to win, if your roof points between 135° and 225° on the compass with no obstructions.

Maybe all this made sense in 2016, but I have always failed to see the logic in any of it.

Suggestion: scrap the whole thing and give a *small* grant to ANYONE who wants solar, not just a lucky few. A simple drive-by will tell you if they lied about getting solar. Enlist the assistance of the local police departments, they drive around all day anyway.

System sizing

Up to 100% of the average of the last 3 years used at that address. Generally speaking, houses are sold by older people to younger people who spawn or have spawned. Families use a whole lot more electricity than little old ladies even if she has several cats. Already this limitation was flawed, even in 2016.

Another criticism is *Why are we looking backwards at all?* We should be looking forwards. The general population uses more electricity each year.

In the past few years, the motto has *Electricify Everything*. The state and federal governments are actively encouraging people to change their vehicles, heating systems and cooking appliances to electric. Cities in California are already not allowing new natural gas hookups.

Suggestion: Allow homeowners to fill their roofs. It's more aesthetically pleasing too. And pay them for ALL the electricity they send to the grid. Get rid of the 125% limit.

Car batteries

I've heard a lot of talk about using EV batteries to balance The Grid. Auto manufacturers will very likely void the warranty if someone participates in that. Pave the way for *Rhode Island Energy* to warranty the EV battery if someone uses their car to put power *into* The Grid when it's needed.

Time of use rates

If you want to flatten the duck curve, people need an economic incentive for the inconvenience.

By the way, my views do not necessarily reflect the views of United Better Homes .

Sincerely,
Sam Brusco