

To whom it may concern, reference the attached, "energy standard 2005 - 01june2007 comments.doc", which I am providing as comments to TVA staff's recommendations on the PURPA Energy Standard 2005.

Thank you for your time,
Matthew Wilson/ WCF Sys Engr

01 June, 2007

To whom it may concern,

The Tennessee Valley expands daily with new housing, even while elsewhere in the US, housing markets noticeably check and plummet. Though due to many factors, the low cost of TVA supplied power is a major contributor to this fact. Farming still exists in the Tennessee Valley region, but city expansions claim more and more farms and acreage to make room for new neighborhoods, schools, and businesses. Many of these new neighborhoods are very noticeable; they can be seen adjacent to the interstates, or just off the old two-lane country roads in your old hometown or outskirts of major cities. Many of these new homes have clear line-of-site to the southern sky; ample opportunity for the conscientious new home owner to harness the sun's energy. Why would not every one install a photovoltaic system, then to have a small income generator, and help kept the regions cost of power low? Why would not every one enforce an efficient new home be built and practice energy saving techniques? Upfront dollar cost, required personal effort, and lack of payback appear to be the main deterrents.

Reference the Energy Policy Act 2005, PURPA Standards, NET METERING write-up, "net_metering-staff.pdf". For the short term, a tax credit is available that helps to offset the upfront cost on photovoltaic systems, but still does not bring the payback period of the system into reasonable means. I concur with TVA's demonstration project, 'Generation Partners' approach, and going with dual-metering system versus net-metering a way to decrease the payback period on a system. I concur with the Energy Policy Act 2005's concepts of net metering, as a whole. However, within said document, a paltry number of residential and commercial solar systems are noted; pitiful for the number of 4.3 million residential, commercial, and industrial end-users in the valley, even at the current purchase price of \$0.15/kWh. Why would not more residents and commercial businesses, having new facilities installed in the middle of tree-less fields, opt to install solar systems? Would LOWERING the purchase price, as the TVA staff's recommendation to, 'prevailing retail rate plus (current) \$0.0267/kWh' help to persuade additional solar generators? Would LOWERING the purchase price help TVA offset future energy growth demand curves? Or would TVA staff's recommendation, combined with time-based metering result in an INCREASE in average purchase price for the solar generators?

Reference the Energy Policy Act 2005, PURPA Standards, INTERCONNECTION write-up, "interconnection-staff.pdf". To even consider selling power back to the grid, one's co-op must agree to the interconnection between the consumer and the utility. Reference page 1, last paragraph of referenced document, "Power distributors [co-ops] served by TVA shall also make available, upon request, such small generator interconnection services to any electric consumers that the power distributor serves." This statement is not clear; the term "shall", means "must", but at whose "request" is not clearly defined. Must a co-op provide for interconnection at the end-consumer, be it residential or commercial, request? This author interprets the Energy Policy Act 2005,

INTERCONNECTION standard to read so. Thus, the TVA recommendation needs to maintain that co-ops shall grant interconnection at the electric consumer's request (given adherence to IEEE standard 1547), versus letting the co-ops decide for themselves.

Further reference the document, "interconnection-staff.pdf", pg 1, last paragraph, continued over to pg 2. This author does not believe that allowing each co-op to develop their own, "...comparable procedures which address distributor-specific...cost-recovery requirements." would be ideal. (I one-hundred percent agree with safety and reliability). The term cost-recovery, though, seems open-ended, allowing for wiggle-room that might not leave the electric consumer with the best set-up for interconnection. The TVA staff's comments should just state to follow "comparable TVA procedures", which would still address reliability and safety, while not allowing the co-ops possible room for passing fines or additional costs to the consumers.

Reference the Energy Policy Act 2005, PURPA Standards, Time-Based Metering write-up, "metering-staff.pdf". This author interprets the TVA staff's recommendation of "TVA will initiate a rate change...with the distributors [co-ops] of TVA power to assess in detail..." to be confusing. Is TVA staff's recommendation to initiate a rate change, or will it just be requesting the distributors consider it? The purpose of the Time-Based Metering standard appears to be the first; that TVA as a whole-sale distributor will pass on the time-based costs to the distributors, who in-turn will pass the time-based costs to the consumers. The biggest help to the residential consumer, would be to pass on real costs AND real savings, along with the education to enable the residents to alter their energy-spending habits.

Why not develop, educate, and support a system that encourages and pays the residential consumers to spend power wisely, with end-consumers reaping the full penalties and more importantly the rewards for time-based metering? With this fully known, maybe more energy efficient houses, facing the south, with deciduous trees in the front lawn would be planned / implemented. Why not encourage solar generation by stating that co-ops shall allow interconnection, if a consumer wants it, versus arbitrarily, if it is cost effective? Why not motivate the conscientious new-home resident to purchase a solar power system by paying him top-dollar (the maximum of either an increase over the current \$0.15kWh purchase price, or a plus system on top of time-based metering prevailing retail rate) for their produced power through a dual-metering system? Why not let TVA and local distributors make the news for 95 percent of a new neighborhood having self solar power cells; it would be great publicity, set national trends, and still be cheaper to push-out additional billions of spending to expand/create additional power capacity.

TVA needs to interconnect and net-meter the solar and wind generators of the Tennessee Valley, compensating them well for their efforts to help the environment, help TVA (alleviate peak demand curves and net energy growth curves), and provide for a home that will have higher net value than surrounding homes with a built in meager revenue generator. Guaranteed, TVA and co-ops alike, as businesses and stewards of the environment will only reap positive results from a major solar and wind generation push.

Thank you for your time,
Matthew Wilson