

On Friday, June 1, 2007 at 14:22:23, the following data was submitted from <http://www.tva.gov/purpa/comments.htm>

6/1/2007 14:22

Name: Gilbert J. Melear-Hough  
Company: Southern Alliance for Clean Energy  
Comment on: Net metering  
Comments: I would like to submit comments in reference to issues of the staff recommendation to use the Generation Partners as the new Net Metering standard. While in general the Generation Partners program is considered an excellent pilot and a national model in terms of overcoming the previous barrier of residential and business interconnecting to the grid. There are some issues that I would like to raise, for using it as a net metering standard.

1. Location of lockable disconnect - The existence of a lockable disconnect is an added safety feature that while not needed with modern UL listed inverters still adds a redundant safety feature that distributors like. While the layout specs were not included in the official Staff Comments the Pilot used drawings that placed the lockable disconnect in a difficult location especially for commercial businesses to install without excessive cost. In most of the existing systems a waiver had to be used with the local distributor - that is not logical to make this design part of the final program. As long as the lockable disconnect is between the generation source and the grid it provides the extra safety desired. I would like to see TVA work with NABCEP certified solar installers to modify the technical layout to make it easier or more cheaply installed – but still to meet the designs important safety function.

2. The second issue is the purchase price of the generation - a two metered system with the lockable disconnect and the detailed laid specs required by the Generation Partners pilot program is more expensive to install than a more traditional net metering program. This cost was covered in the pilot by a \$500. dollar payment to residential homes and the 15 cents a kWh cost or the 20 cents for large commercial systems. If the purchase price of the generation is only slightly over the residential rate then there is no benefit to participate other than the desire to connect with the grid. It should be noted that any home or business will get the equivalent of retail rate as long as they have a system sized to generate less than they consume. As if they do not have to purchase power from the local power distributor they are saving power at the retail rate. THEREFORE - there is a very strong chance that homes will start once more connecting to the grid without parti!

icipating in the "Generation Partners" style program to save the money from the expensive dual metering design. That being the case the new net metering program will not fulfill its most important function of assuring that the program promotes safety. This is a large and very important flaw especially as solar is growing at a rate of 40 percent a year and TVA must design a program that will meet the future needs for this technology to connect to the grid in a safe way.

3. In TVA recent strategic plan the board made the promoting of clean renewable energy a strategic priority. A progressive net metering standard is the simplest way to implement this – in fact it is the model that TVA has showed the most success in through the Generation Partners program. It is in fact the most logical way for TVA to support this strategic objective and to also support such valley wide innovation as showcased in the Zero Energy Houses being developed by Oak Ridge National Laboratory – who have requested a rate of 25 cents a kWh and Sharp Solar in Memphis, TN the United States largest solar PV manufacturing plant.

In conclusion while using the Generation Partners pilot, as the permanent Net Metering standard on the surface, is an excellent decision - there are serious modifications needed to make this a useable solution. First the location of the lockable disconnect must be modified, and second if the program wants to have anyone actually participate the purchase price needs to either remain at 15 cents a kWh or be raised. I would recommend that if TVA wants to achieve its strategic goals and support innovation in the Tennessee Valley that the rate be similar to what is being payed in North Carolina which is 20 cents a kWh. A rate of 25 cents a kWh is what Oak Ridge National Laboratory of what has modeled is needed to achieve Zero Energy Houses.

Thank you for your consideration of these comments and I would love to work with you on their implementation.

City: Knoxville  
State: TN  
Zip: 37902