



Chairman Stein, Vice-Chair Blasdel, Ranking Member Weinstein, and members of the House Public Utilities Committee, thank you for the opportunity to submit proponent testimony on House Bill 197. My name is Carlo Cavallaro and I'm the Midwest Regional Director at the Coalition for Community Solar Access.

CCSA represents more than 120 businesses that have deployed over \$10 billion in private investments to upgrade the electric grid and build approximately 1,400 community solar projects across the country, enough to power over 1MM homes.

I am here to voice our industry's support for HB 197. I want to begin by explaining that HB 197 is the successor to HB 450, and its current form is the result of several meetings with interested parties and opponents which led to revisions improving the legislation overall.

Community solar provides every household and business access to solar energy without needing to install a system on site. We serve the 60%-70% of Americans who don't have access to their roof, for a myriad of reasons. Each project has multiple subscribers who subscribe to the energy produced and receive a credit on their electricity bill for that portion of the generation. It's simply an on-bill transaction with no physical infrastructure required to be placed on the customers' home.

It gives citizens and businesses the *choice* to participate and does not require state funding or state subsidies - community solar is not a mandate.

HB 197 if passed would establish the Ohio Community Solar Pilot Program, considering the size and scale of OH it's a small but meaningful effort to allow OH to introduce distributed generation spread across the 4 EDU territories.

The program totals 1,500 MWs which is broken into 1,000 designated for open lands and 500 MW designated for distressed and brownfield sites specifically. Commercial rooftops are also common locations for development.

The 1,000 MW is allocated at 250 MW annually over 4 years and apportioned across the 4 EDUs' territories proportionally.

The evolution of the legislation has seen compromise and amendment to address, the size of the developments, co-location (to prevent stringing small projects into utility scale), guaranteed savings, unsubscribed energy, decommissioning, assuring local control over the developments, confirming municipal-aggregators ability to purchase community solar generation and more.



Community solar is successfully being deployed in over 20 states because the benefits are many.

Community solar saves customers money with no mandates.

Ratepayers can choose to stay with their current service or subscribe to a community solar facility where customers will save on average between 10%-20%. Ohio subscribers only see a credit on their bill for their supply charges, the customer would still pay for the poles and wires thus the EDUs infrastructure continues to be supported.

Community solar is a major economic driver and would attract new businesses and highly skilled jobs to the state. Based on the economic impact analysis from Ohio University OH would see \$5.6B in overall economic impact and \$490M in local tax revenues.

Community solar helps to modernize the grid by leveraging private investment dollars NOT rate payer funds, the developments improve distribution infrastructure - often to the tune of hundreds of thousands of dollars per project. This investment benefits all ratepayers, specifically those who live near the project.

And because facilities must be built in the utility service territory where the customer resides, **it creates homegrown energy and adds to an all of the above approach**, reducing the state's dependence on imported energy from neighboring states across already strained interstate transmission lines.

For the record, Pennsylvania's energy strategy of continuing to assure they export their abundant excess electricity is openly aligned with Ohio's continued dependence on imported energy.

Again, I want to repeat that all subscribers to a community solar project will continue to pay their local utility for fixed charges including distribution fees to support the system's poles and wires.

Lastly, I'd like to proactively address two objections the utilities continue to say about HB 197.

Cost Shift:

Utilities often oppose customer-driven, third-party owned energy projects like community solar because they threaten to supplant utility investments and shareholder profits. They use "cost-shift" — the idea that when one ratepayer benefits, the others bear the cost — as their bogeyman. And because utility ratemaking happens in a black box, it's hard for anyone to argue against it. The utilities routinely make these claims by simply focusing on costs and ignoring benefits.



That narrative is disingenuous. I reviewed recent Multi-year grid plans and the inclusion of Benefits at a factor of 1.3 and 1.6 were prominently featured, including generous accounting for societal benefits.

The reality is that research and numerous cost-benefit analyses from around the country show the so-called “cost shift” narrative is false and that the benefits smaller projects bring to the entire electric grid categorically reduce long-term costs for all ratepayers. That’s because small projects placed on the distribution system closer to customers make more efficient use of existing infrastructure and allow utilities to reduce and avoid certain costs that ratepayers would otherwise incur.

These savings include: leveraging private capital to upgrade the distribution system; reducing investment required to develop expensive transmission projects; greater fuel diversity; reduction in the use of expensive and polluting peaker plants; and an overall reduction in how much electricity is lost when it travels from central power plants to the end customer.

Karl Robago will be presenting our cost benefit analysis today and he will be show the true impact of the Ohio Community Solar Pilot Program for OH.

Next I’d like to address Unsubscribed Energy:

This issue was raised and addressed in HB450, the current language in HB 197 provides for the unsubscribed energy (if any) be purchased by the EDUs at WHOLESale, which they then re-sell.

The utilities will bemoan the need to purchase unsubscribed energy, but this is a classic distraction and shouldn’t be an issue. The truth is across the history of community solar in 20 states there is generally 1% - 2% unsubscribed energy. Further the unsubscribed energy routinely arises from subscribers relocating and there is a simple gap in the subscriptions. Community Solar generally operates with waiting lists for subscribers, demand far outpaces supply. Thus, this is a paper tiger at best.

Under HB 197 the developers take on all the risk of these projects, and unlike the utilities, they can’t rate-base the project should it become uneconomical. These developments will always be putting all their output into the system, so as a point of fairness a mechanism should be if pays for all that generation.

Regardless, as HB 197 allows the EDUs to purchase this energy at the wholesale rate, worst case it is a simple pass through and would have no financial impact.



We're proud of the work that went into this legislation, and we would welcome the opportunity to work with OH to bring more home-grown generation back to OH in order to support all of the great economic development and rising electrical demand coming to OH annually.

Final note, throughout this process we have continued to grow support for community solar each month. I invite you to note the variety of supporters here today and scroll through the dozens more who submitted their support online.

Thank you for the time, and I am happy to answer any questions.