



December 1, 2023

Cathy Boies  
Gridworks  
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**RE: Comments on Behalf of Sunergy Systems, McKinstry, Western Solar and WASEIA on the E3 NEM evaluation preliminary results**

Dear Ms. Boies,

The undersigned were official participants in the Department of Commerce Technical Advisory Group convened to inform the E3 Consulting study of potential utility customer rate impact of distributed solar. Our individual companies are members of the Washington Solar Energy Industries Association, a trade association representing 35 members companies employing over 4,100 citizens in the statewide.

We appreciate the hard work and attention of all involved. However, as was stated several times throughout the process, we wish to respectfully note for the official record concerns about the speed of the process and how the meetings were organized and conducted.

The items outlined below are a few of the major issues we found with this process which may be largely the result of the compressed timetable to conduct the study. These were concerns raised at the time that this utility-funded study was announced, and the TAG was convened last summer, that this schedule was too short, which is further evidenced by the far longer timelines taken to do similar studies in several other states.

**TAG Recruitment.** This TAG was hastily convened over a month in the Summer which resulted in non-participation by parties who should have been at the table, particularly voices of tribes and named communities. Throughout the process TAG members exhibited a lack of attendance, and a lack of response to surveys and questions circulated during meetings.

**Timeliness.** Datasets and other meeting materials were repeatedly not delivered to TAG members on a consistent and timely basis, making it difficult for participants to adequately prepare for the three TAG sessions. In the case of the third and final TAG meeting, some information, including a crucial data model, was not provided until *after* the meeting.

**Meeting Standardization.** Meetings were not conducted via Roberts Rule of Order or a similar, standard regimen to formally structure meetings. This lack of structure allowed discussion to be shaped and often dominated by meeting participants that were not actual members of the TAG.

**Lack of Benefits.** A thoughtful and lengthy list of the benefits of distributed generation were identified by TAG participants in Meeting No. 1, but virtually none of those benefits were included by E3 in the preliminary cost shift calculations. E3 cited time constraints and lack of resources as the reason these important points were left unaddressed.

**A Distant TAG.** TAG members with specific professional expertise were not consulted on the proper sources of much of the data used in the preliminary cost shift calculations. Examples include: the state's distributed solar production metric, UL 1741-SB smart inverters, and contemporary price-per-watt cost figures.

**Conclusion.** A properly planned and executed process must be undertaken to ensure that unvetted and inaccurate assumptions, regardless of the party's position, are not used to influence policy in Washington State. When a single party is allowed to dominate the outcome of the process by controlling what gets evaluated, how it is evaluated, and how it is presented to the public, as happened in this study, it will inevitably end with a significantly biased view rather than a consensus view. This flawed and incomplete study could result in a major disruption in the current acceleration of deployment of valuable distributed energy resources needed to meet Washington's clean energy goals and energy building code requirements.

Again, we wish to thank everyone who provided their time and talents to this important and necessary work. We hope this discussion can continue when appropriate, with a more appropriate timeline, and more dedicated resources.

Sincerely,

*/s/ Jon Lange*  
President, Sunergy Systems

*/s/ Eric Blatz*  
General Manager, Western Solar

*/s/ Jon Miller*  
Development Director – Renewables, McKinstry

*/s/ Bill Will*  
Business Growth and Development Director, WASEIA