

Commonwealth of Virginia

**STATE CORPORATION COMMISSION
DIVISION OF PUBLIC UTILITY REGULATION**

MEMORANDUM

Date: 5/27/2025

To: Document Control

From: Michelle Brown-White, Division of Public Utility Regulation

RE: Appalachian Power Company - For approval of future minimum bill, tariffs, and agreements to implement a shared solar program, pursuant to section 56-594.4 of the Code of Virginia

Attached are three (3) comments submitted to the Commission for consideration. Please enter in the case jacket for Case No. **PUR-2025-00028**.

Thank you.

Ruth Amundsen, Bettina Hendrick, and Selah Goodson Bell

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From: noreply@scc.virginia.gov
To: [PUR Comments](#)
Subject: Confirmation of your form submission
Date: Sunday, May 25, 2025 5:50:36 PM
Attachments: [Amundsen+comments+on+APCo+min+bill+proposal.pdf](#)

Below is a copy of the information you sent to us.

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Ruth McElroy Amundsen

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May 25, 2025

Hon. Chair Samuel T. Towell
Hon. Jehmal T. Hudson
Hon. Kelsey A. Bagot
State Corporation Commission
Tyler Building
1300 E. Main Street
Richmond, Virginia 23219

RE: Case No. PUR-2025-00028

Dear Chair Towell, Commissioner Hudson, and Commissioner Bagot,

I appreciate the opportunity to provide comments on the Appalachian Power Company's ("APCo") proposed minimum bill included in their Petition filed on April 1, regarding the implementation of a Shared Solar Program pursuant to Virginia Code § 56-594.4¹.

I run several small LLCs that install solar via Power Purchase Agreements. Sun Dogs LLC is a multi-member LLC of parents which installed \$1M of solar on the independent school Norfolk Academy in 2018. Norfolk Solar Qualified Opportunity Zone Business installed \$700K of solar on churches, non-profits, family-owned businesses and homes in Hampton Roads in 2019 to 2021. Norfolk Solar LLC has worked with other investors to install solar in several locations around Virginia since 2020. Sun Spots LLC has 15 solar installs completed and in construction, for a total of about \$2M in installs in 2025. I was hoping to expand into shared solar, but the proposed minimum bill would make that infeasible.

I believe that APCo's proposed minimum bill does not adequately account for or calculate the "benefits of shared solar to the electric grid and to the Commonwealth", as required by statute. The proposal not only falls short of the legislative intent, but also risks undermining the potential for any shared solar projects to be developed in APCo's territory, much less the opportunity for customers in Southwest Virginia to benefit as subscribers to a project.

The VCEA, and the move to establish a shared solar program in APCo's service territory, are huge opportunities for our state to experience the many benefits from a boost to solar – job creation, clean energy generation, lessened fossil fuel use and pollution, decrease of dirty and expensive peaker plants, and related energy infrastructure, which is often located in disadvantaged neighborhoods, to their severe detriment. It is important to leverage the lessons learned from Dominion's shared solar program. A key lesson was that the minimum bill for

¹ <https://law.lis.virginia.gov/vacode/56-594.4/>

Dominion was excessively high and only considered potential costs, and not benefits, associated with shared solar. The General Assembly sought to correct this issue for Dominion's program and to get it right the first time for APCo's program by explicitly requiring that the minimum bill calculation incorporate "benefits of shared solar to the electric grid and to the Commonwealth."

Others have undoubtedly commented on the many benefits of shared solar, from being a distributed energy resource that's both cleaner and closer to load compared to conventional energy sources, to providing much-needed electricity cost savings to participating customers, and other benefits such as jobs and economic development, revenue for landowners, and tax revenues for localities.

I would like to focus on two things: the effect of the minimum bill, and the calculation of social cost of carbon.

The minimum bill calculation from APCo results in roughly a \$49 per month charge for a typical residential subscriber, reminiscent of the \$55-minimum bill² established in Dominion territory three years ago. If this minimum bill is adopted, it will result in shared solar projects being fundamentally uneconomical, and there will be no shared solar projects built in Southwest Virginia. This would be a sad lost opportunity for our Commonwealth.

The social cost of carbon is a fundamental part of any rigorous energy planning activity. By Virginia law, under the VCEA, utilities are legally required to calculate and include the social cost of carbon in any decision they make about energy generation. APCo does not seem to have taken any steps toward that in their application. There is a standard federal framework for calculation of social cost of carbon, here, https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf. The additional benefits that shared solar would offer to our state and utility are concrete and obvious when those calculations are done. Additionally, that framework is extremely conservative, and does not yet include the costs for many aspects of climate change caused by fossil fuels – the framework is revised over time, as costs are better able to be quantified. Just as an example of all the things that are not currently included in that calculation, Table 3.2.1 from that document is shown below. A few examples of things not included in how we currently value solar are temperature and precipitation extremes due to climate change, ocean acidification, ozone destruction, mortality due to air pollution, decrease of labor productivity due to heat, costs to buildings of extreme weather and increased frequency of coastal storms, impacts on tourism, destruction of natural capital and biodiversity, and impacts on military bases.

So, APCo has chosen not to quantify even the benefits of solar energy that are currently within the required federal framework. In the coming years, as more and more of the above items are able to be more accurately estimated as far as cost impacts of fossil fuels versus renewables,

² <https://virginiamercury.com/2022/10/14/dominion-shared-solar-minimum-bill-to-remain-55-10-per-month/>

APCo's decision to not accord any of the proper cost benefits of solar in their calculation of what shared solar would be worth, will look more and more foolish.

Table 3.2.1: Climate and Earth Science, Impacts, and Damages Included in the Updated SC-GHG Estimates

Climate and Earth Science	Impacts and Associated Damages
Temperature change	Human Health and Well-being
Averages	Heat and cold related mortality
Extremes	Mortality and morbidity from extreme weather events (e.g., storms, wildfire, flooding), and sea level rise
Variability	Mortality and morbidity from climate mediated changes in the formation of criteria air pollutants (e.g., ozone, PM2.5)
Sea level rise	Infectious diseases
From average temperature change	Other morbidity (e.g., malnutrition, allergies)
Non-linear effects (e.g., ice-sheet collapse)	Displacement and migration
Precipitation	Labor
Averages	Labor supply (i.e., hours worked)
Extremes	Labor productivity (i.e., output per hour worked)
Variability	Energy
Humidity – wet-bulb temperature	Energy consumption (e.g., heating, cooling)
Additional impacts from large scale Earth system changes (tipping elements, etc.)	Energy production and provision (e.g., hydroelectric, thermal power generation)
Temperature	Water
Sea level rise	Water consumption (residential, industrial, commercial)
Precipitation	Provision of safe drinking water
Extreme weather events	Water storage and distribution
Ecosystems	Land
Other impacts	Coastal land loss from sea level rise
Non-climate mediated effects (e.g.)	Buildings, transportation, and infrastructure
Carbon fertilization (CO ₂)	Sea level rise
Ocean acidification (CO ₂)	Intensity or frequency of coastal storms
Tropospheric ozone formation (CH ₄)	Extreme weather inland (e.g., storms, wildfire, flooding)
Stratospheric ozone destruction (N ₂ O)	Environmental conditions (e.g., melting permafrost, air temperature and moisture)
Methodology	Food production
Explicit treatment of uncertainty	Agriculture/Crop production
Accounting for adaptation and costs of adaptation	Animal and livestock health and productivity
Interactions across sectors	Fisheries and aquaculture production
Feedbacks across modules (e.g., from damages to socioeconomics and emissions, from climate to emissions)	Forestry
Valuation of risk	Timber, pulp, and paper production
	Tourism, recreation, aesthetics, culturally historic sites
	Visitation, locations, and opportunities (e.g., recreational fishing, skiing, scuba diving, scenic views)
	Ecosystem services
	Availability and quality of natural capital used in the production of marketable goods
	Biodiversity and wildlife habitat (e.g., aquatic environments, breeding grounds)
	Other provisioning and regulating services (e.g., water filtration, wildfire/flood/pest mitigation, medicinal resources, pollination)
	Culturally and historically significant landmarks and resources
	Crime (property, violent)
	National Security
	Military base impacts
	Military mission impacts from international civil conflict
	International development, humanitarian assistance
	Trade and logistics
	Supply chain disruption (e.g., from extreme weather)
	Supply chain transitions (e.g., altering trade routes)

Table 3.2.1 presents a general indication of the climate science, impacts, and damages included across the three damage modules used in this analysis and is not designed to be reflective of any one specific damage module.

With the APCo program anticipated to open this summer, I hope the program will be able to hit the ground running and I urge the Commission to include the full benefits associated with shared solar projects in the minimum bill calculation. This will ensure the program is living up to its legislative intent to account for such benefits, while also giving it the best opportunity to meet another statutory requirement: to “reasonably allow for the creation of shared solar facilities”.

I appreciate the opportunity to provide these comments and for your consideration on this critical and determining element of the APCo shared solar program.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ruth M. Amundsen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ruth M Amundsen
Sun Spots LLC

From: noreply@scc.virginia.gov
To: [PUR Comments](#)
Subject: Confirmation of your form submission
Date: Saturday, May 24, 2025 2:50:08 PM

Below is a copy of the information you sent to us.

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Electronic Documentation	
Comments	I AM 67 YEARS OLD. I HAVE A MORTGAGE & OTHER BILLS TO PAY MONTHLY. I AM NOT IMMUNE TO WHAT OUR GOVERNMENT IS DOING OUT OF REVENGE. I AM ALSO BEING AFFECTED BY TARIFFS ETC. NO MORE RATE INCREASES FOR AEP NEED TO BE APPROVED.
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Attorney E-mail 3	
Attorney E-mail 4	
Case Number	2025-00028

From: noreply@scc.virginia.gov
To: [PUR Comments](#)
Subject: Confirmation of your form submission
Date: Friday, May 23, 2025 6:00:39 PM
Attachments: [SUN+PUR-2025-00028+Comments.pdf](#)

Below is a copy of the information you sent to us.

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Electronic Documentation	SUN+PUR-2025-00028+Comments.pdf
	<p>State Corporation Commission: PUR-2025-00028 Solar United Neighbors (SUN) is a national non-profit organization representing the interests of current and prospective rooftop and community solar customers and those of the broader communities they belong to and uplift. Since 2014, SUN has facilitated almost 1,300 residential solar installations in Virginia, directly helping households minimize their utility bills and support the ongoing transition to clean energy. SUN has also intervened at the Commission and legislative level to support the growth of Virginia's Shared Solar Program. The program is a vital effort to democratize Virginia's clean energy transition by increasing access to distributed solar for families and individuals who rent, have shaded roofs, or lack the capital to afford the upfront costs of solar installations. Appalachian Power Company's (APCo) proposed \$50 minimum bill</p>

for its Shared Solar Program relies on a flawed Benefit Cost Assessment methodology and ultimately sets the program up to fail from the start. APCo's proposal risks stifling the market for shared solar and exacerbating existing energy inequities at a time when customer friendly and cost-effective clean energy solutions are desperately needed to mitigate the impacts of surging energy burdens and load growth in the Commonwealth. SUN respectively urges the Commission to adopt a minimum bill of \$0, consistent with the position expressed by the Coalition for Community Solar Access (CCSA) and set a regulatory foundation for accurately and fairly valuing the costs and benefits of distributed solar. Shared Solar Provides Critical Benefits to the Grid and the Commonwealth Shared solar can offer participating households' significant reductions on their bills, often saving families at least 10% in most markets and as high as 50% for income eligible customers in other parts of the Atlantic Southeast Region. These savings are especially critical as rising utility bills make it harder for families to pay rent and avoid evictions, pay medical bills, keep their homes at safe temperatures during extreme weather, and afford a wide range of life-sustaining essentials. In the last four years, APCo's rate hikes have caused the average monthly residential bill to surge by almost 50%. Similarly, the cost of living continues to outstrip wage growth in Virginia, leading to a 13% increase of households in poverty between 2010 and 2023. Inflation in the South as a whole was up 2% compared to last year as of April 2025. Shared solar eases these financial hardships, offers families economic stability, and can localize the transformative benefits of clean energy in communities that are most energy insecure. Shared solar reduces overall grid costs and improves the reliability of the grid by minimizing line losses, deferring the need for investments into expensive transmission infrastructure, reducing the reliance on price volatile gas, and avoiding the need for investments into fossil fuel generation units. It also makes the grid more resilient against large-scale disruptions, like extreme weather events that can cause widespread blackouts. These essential services benefit all ratepayers, regardless of their participation in the Shared Solar Program, and help prepare the Commonwealth's grid to effectively

Comments

accommodate forecasted load growth due to growing electrification and incoming data centers. Finally, community solar goes beyond the grid to offer transformative economic, health, and environmental benefits across the state. The resource spurs an increase in jobs, boosting employment for local salespeople, electricians, and installers. It also reduces the need to rely on polluting sources of power generation— this offers massive improvements to air and water quality and translates to improved public health outcomes for people living in overburdened and fenceline communities. ApCo's Minimum Bill Proposal Relies on a Flawed Cost Benefit Analysis SUN strongly agrees with the testimonies of Charlie Coggeshall and Anirudh Kshemendranath, on behalf of CCSA and Dunskey, which concluded that APCo's proposal falls short of the requirements of a cost-benefit framework established under Virginia Code § 56-594.4 D. APCo's analysis undervalues multiple grid benefits, including the transmission charge and renewable energy certificate credits, and excludes several grid and societal factors, including avoided energy cost, avoided transmission and distribution capacity cost, generation reliability, demand reduction induced price effect, and multiple others. Several expert witnesses and the Commission Staff found that APCo adopted a similarly narrow and inaccurate approach when evaluating the cost-effectiveness of its net metering program to justify extreme cuts to the compensation rate. APCo's analysis perpetuates a false idea that distributed solar forces non-participating customers to bear an unfair share of grid infrastructure costs that far exceed any benefits they receive. Many other utilities similarly raise the "cost shift" as justification to reduce NEM compensation rates or add obstructively expensive and discriminatory fixed charges for solar customers. But these anti-competitive tactics have nothing to do with a genuine concern for the energy affordability struggles of ratepayers. If they did, utilities would be trying to rein in excessive rate hikes and prioritize rather than block the deployment of rooftop and shared solar, energy efficiency, demand response, electrification measures, and other customer-friendly resources in income eligible and overburdened communities. Clearly, APCo

understands that Shared Solar and other similar resources reduce the need for utility-scale, centralized infrastructure—the greatest source of their profits which increased by 20% to reach \$164.6 million dollars in Q1 this year — and thus view and treat them primarily as threats to their bottom line. APCo is following the footsteps of many other like-minded investor-owned utilities who deliberately narrow the range of factors considered in their value of solar analyses to justify lowering incentives and increasing obstacles for distributed solar customers. This is in stark contrast to the majority of value of solar studies which have found distributed solar to be a cost effective resource to both the grid and society as a whole. One such study from the Lawrence Berkeley National Laboratory also determined that the biggest drivers of rate increases for customers are utility capital expenditures and the price volatility of fossil fuels, like natural gas. Kshemendranath's quantitative analysis is consistent with these more comprehensive studies, including those used in jurisdictions like New Hampshire and Maine, and adopts a methodology that aligns with the National Standard Practice Manual. After correcting for APCo's analytical shortcomings, he found that a narrow evaluation of the benefits of the Shared Solar Program to the utility and grid alone results in about \$8 million in savings. This figure skyrockets to \$74 million when societal benefits, like avoided air pollutants, local job impacts, and avoided greenhouse gas emissions, are properly integrated into the analysis. The Shared Solar Program will be doomed from the start if the Commission disregards these findings and adopts APCo's proposed minimum bill of about \$50 (for a typical residential customer). The minimum bill would risk violating Virginia Code § 56-594.4 F 1 and 2 by eliminating the cost effectiveness of shared solar projects for all customer classes. For example, Dominion's Shared Solar Program has only developed projects that serve low income residential customers who are exempt from the minimum bill. The economic viability of shared solar for all other classes of customers has been tarnished thanks to the high minimum bill. A more devastating outcome would emerge if APCo's proposed minimum bill is adopted, as its program does not exempt low-income customers from paying the minimum bill. In

	conclusion, SUN requests that the Commission adopt a minimum bill of \$0 to ensure APCo's Shared Solar Program is effective, accessible, and aligned with the Commonwealth's clean energy goals under the Virginia Clean Economy Act. Respectfully submitted, Selah Goodson Bell Atlantic Southeast Policy & Advocacy Campaigner, Solar United Neighbors
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Case Number	2025-00028
Prefix	PUR
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scc.virginia.gov



State Corporation Commission: PUR-2025-00028

Solar United Neighbors (SUN) is a national non-profit organization representing the interests of current and prospective rooftop and community solar customers and those of the broader communities they belong to and uplift. Since 2014, SUN has facilitated almost 1,300 residential solar installations in Virginia, directly helping households minimize their utility bills and support the ongoing transition to clean energy. SUN has also intervened at the Commission and legislative level to support the growth of Virginia's Shared Solar Program. The program is a vital effort to democratize Virginia's clean energy transition by increasing access to distributed solar for families and individuals who rent, have shaded roofs, or lack the capital to afford the upfront costs of solar installations.

Appalachian Power Company's (APCo) proposed \$50 minimum bill for its Shared Solar Program relies on a flawed Benefit Cost Assessment methodology and ultimately sets the program up to fail from the start. APCo's proposal risks stifling the market for shared solar and exacerbating existing energy inequities at a time when customer friendly and cost-effective clean energy solutions are desperately needed to mitigate the impacts of surging energy burdens and load growth in the Commonwealth.

SUN respectfully urges the Commission to adopt a minimum bill of \$0, consistent with the position expressed by the Coalition for Community Solar Access (CCSA) and set a regulatory foundation for accurately and fairly valuing the costs and benefits of distributed solar.

Shared Solar Provides Critical Benefits to the Grid and the Commonwealth

Shared solar can offer participating households' significant reductions on their bills, often saving families at least 10% in most markets and as high as 50% for income eligible customers in other parts of the Atlantic Southeast Region. These savings are especially critical as rising utility bills make it harder for families to pay rent and avoid evictions, pay medical bills, keep their homes at safe temperatures during extreme weather, and afford a wide range of life-sustaining essentials. In the last four years, APCo's rate hikes have caused the average monthly residential



bill to surge by almost 50%.¹ Similarly, the cost of living continues to outstrip wage growth in Virginia, leading to a 13% increase of households in poverty between 2010 and 2023.² Inflation in the South as a whole was up 2% compared to last year as of April 2025.³ Shared solar eases these financial hardships, offers families economic stability, and can localize the transformative benefits of clean energy in communities that are most energy insecure.

Shared solar reduces overall grid costs and improves the reliability of the grid by minimizing line losses, deferring the need for investments into expensive transmission infrastructure, reducing the reliance on price volatile gas, and avoiding the need for investments into fossil fuel generation units. It also makes the grid more resilient against large-scale disruptions, like extreme weather events that can cause widespread blackouts. These essential services benefit all ratepayers, regardless of their participation in the Shared Solar Program, and help prepare the Commonwealth's grid to effectively accommodate forecasted load growth due to growing electrification and incoming data centers.

Finally, community solar goes beyond the grid to offer transformative economic, health, and environmental benefits across the state. The resource spurs an increase in jobs, boosting employment for local salespeople, electricians, and installers. It also reduces the need to rely on polluting sources of power generation—this offers massive improvements to air and water quality and translates to improved public health outcomes for people living in overburdened and fenceline communities.

¹ In 2021, the average residential customer who used 1,000 kilowatt hours of electricity was paying \$117 per month. PUR-2021-00206, 338665, 12/30/2021 <https://www.scc.virginia.gov/DocketSearch/Home/Document/12/338665>; Kelsey Childress, 'I think it's insane.' ABC13 investigates why your power bill has spiked in recent years, ABC13 News (Oct 9 2024). <https://wset.com/news/abc13-investigates/abc13-investigates-why-your-power-bill-has-spiked-in-recent-years-aep-appalachian-electric-power-delegate-sam-rasoul-october-2024>. In 2025, the average residential customer who used 1,000 kilowatt hours of electricity is paying \$174 per month. Virginia Electric Rates, Appalachian Power Company, <https://www.appalachianpower.com/company/about/rates/va/>. The difference between \$174 and \$117 is \$57, which is 48.7% of \$117.

² Costs Over Time: The ALICE Essentials Index, United for ALICE, 2025, <https://www.unitedforalice.org/costs-over-time/virginia>.

³ Consumer Price Index, South Region — April 2025, U.S. Bureau of Labor Statistics, https://www.bls.gov/regions/southeast/news-release/consumerpriceindex_south.htm.



APCo's Minimum Bill Proposal Relies on a Flawed Cost Benefit Analysis

SUN strongly agrees with the testimonies of Charlie Coggeshall and Anirudh Kshemendranath, on behalf of CCSA and Dunskey, which concluded that APCo's proposal falls short of the requirements of a cost-benefit framework established under Virginia Code § 56-594.4 D.⁴ APCo's analysis undervalues multiple grid benefits, including the transmission charge and renewable energy certificate credits, and excludes several grid and societal factors, including avoided energy cost, avoided transmission and distribution capacity cost, generation reliability, demand reduction induced price effect, and multiple others. Several expert witnesses and the Commission Staff found that APCo adopted a similarly narrow and inaccurate approach when evaluating the cost-effectiveness of its net metering program to justify extreme cuts to the compensation rate.⁵

APCo's analysis perpetuates a false idea that distributed solar forces non-participating customers to bear an unfair share of grid infrastructure costs that far exceed any benefits they receive. Many other utilities similarly raise the "cost shift" as justification to reduce NEM compensation rates or add obstructively expensive and discriminatory fixed charges for solar customers. But these anti-competitive tactics have nothing to do with a genuine concern for the energy affordability struggles of ratepayers. If they did, utilities would be trying to rein in excessive rate hikes and prioritize rather than block the deployment of rooftop and shared solar, energy efficiency, demand response, electrification measures, and other customer-friendly resources in income eligible and overburdened communities.

Clearly, APCo understands that Shared Solar and other similar resources reduce the need for utility-scale, centralized infrastructure—the greatest source of their

⁴ Direct Testimony of Charlie Coggeshall and Anirudh Kshemendranath on behalf of the Coalition for Community Solar Access, PUR-2025-00028;

<https://www.scc.virginia.gov/docketsearch/DOCS/85%201!.PDF>;

<https://www.scc.virginia.gov/docketsearch/DOCS/85%24%2501!.PDF>;

⁵ Prefiled Staff Testimony, Appalachian Power Company, for approval to review its net metering program pursuant to § 56-594 of the Code of Virginia, Volume I of III.

<https://www.scc.virginia.gov/docketsearch/DOCS/84x701!.PDF>; Volume II of III

<https://www.scc.virginia.gov/docketsearch/DOCS/84x801!.PDF>; Volume II of III Part C

<https://www.scc.virginia.gov/docketsearch/DOCS/84x901!.PDF>; Volume III of III

<https://www.scc.virginia.gov/docketsearch/DOCS/84x%4001!.PDF>.



profits which increased by 20% to reach \$164.6 million dollars in Q1 this year⁶—and thus view and treat them primarily as threats to their bottom line.

APCo is following the footsteps of many other like-minded investor-owned utilities who deliberately narrow the range of factors considered in their value of solar analyses to justify lowering incentives and increasing obstacles for distributed solar customers. This is in stark contrast to the majority of value of solar studies which have found distributed solar to be a cost effective resource to both the grid and society as a whole.⁷ One such study from the Lawrence Berkeley National Laboratory also determined that the biggest drivers of rate increases for customers are utility capital expenditures and the price volatility of fossil fuels, like natural gas.⁸

Kshemendranath's quantitative analysis is consistent with these more comprehensive studies, including those used in jurisdictions like New Hampshire and Maine, and adopts a methodology that aligns with the National Standard Practice Manual. After correcting for APCo's analytical shortcomings, he found that a narrow evaluation of the benefits of the Shared Solar Program to the utility and grid alone results in about \$8 million in savings. This figure skyrockets to \$74 million when societal benefits, like avoided air pollutants, local job impacts, and avoided greenhouse gas emissions, are properly integrated into the analysis.

The Shared Solar Program will be doomed from the start if the Commission disregards these findings and adopts APCo's proposed minimum bill of about \$50 (for a typical residential customer). The minimum bill would risk violating Virginia Code § 56-594.4 F 1 and 2 by eliminating the cost effectiveness of shared solar projects for all customer classes.⁹ For example, Dominion's Shared Solar Program

⁶ United States Security and Exchange Commission Washington, D.C. 20549 Form 10-Q Quarterly Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 For The Quarterly Period Ended March 31, 2025, Appalachian Power Company and Subsidiaries Reconciliation of First Quarter of 2024 to First Quarter of 2025 Net Income (in millions), <https://docs.aep.com/docs/investors/AEP10Q20251Q.pdf>.

⁷ The True Value of Solar Measuring the Benefits of Rooftop Solar Power, Environment America, July 2019, <https://publicinterestnetwork.org/wp-content/uploads/2022/08/AME20Rooftop20Solar20Jul1920web-1.pdf>.

⁸ Galen Barbose, Putting the Potential Rate Impacts of Distributed Solar into Context, <https://eta-publications.lbl.gov/sites/default/files/lbnl-1007060-es.pdf>.

⁹ Code of Virginia § 56-594.4. Shared solar programs; Phase I Utility. <https://law.lis.virginia.gov/vacode/title56/chapter23/section56-594.4/>.



has only developed projects that serve low income residential customers who are exempt from the minimum bill. The economic viability of shared solar for all other classes of customers has been tarnished thanks to the high minimum bill. A more devastating outcome would emerge if APCo's proposed minimum bill is adopted, as its program does not exempt low-income customers from paying the minimum bill.

In conclusion, SUN requests that the Commission adopt a minimum bill of \$0 to ensure APCo's Shared Solar Program is effective, accessible, and aligned with the Commonwealth's clean energy goals under the Virginia Clean Economy Act.

Respectfully submitted,

Selah Goodson Bell
Atlantic Southeast Policy & Advocacy Campaigner,
Solar United Neighbors