

**REV Standard Offer Comments**  
**11-10-2016**

- Maintain the 2016 price caps and technology break-outs for non-preferred locations.
  - o REV notes that the existing price caps are extremely competitive, and for solar projects actually below rates permitted for recent utility developed projects.
- Preferred locations should not be subject to a price cap for the first year, but proposals should be evaluated competitively.
- REV encourages the Board to consider explicitly allowing energy storage projects to be eligible for the Standard Offer program. As an emerging technology that offers ratepayers cost savings through reducing peak demand, as well as enabling greater levels of renewable energy onto the grid in addition to resilience benefits, energy storage meets goals of the Standard Offer program.
- While REV supports continuing a competitive bid process, it is important to recognize that several lowest bid projects have not been built. Due to the exclusive evaluation of lowest bid, the Standard Offer Program is averaging just 1 MW of projects annually. For these reasons REV urges the Board to continue to maintain a reserve list. REV would also support an evaluation of projects beyond the lowest bid exclusive.
- REV shares concerns raised about project costs, but notes that the project size limits in the Standard Offer Program do not enable lower costs feasible through economies of scale through larger projects. REV urges the Board to again allow technology carve out flexibility, so that lower cost projects exceeding a specific technologies size allowance will not be disqualified from the program. Permitting project size flexibility would allow for customer savings and benefits of economies of scale.
- REV notes that due to recent significant regulatory and statutory changes including PURPA, net-metering, and Act 174, future in-state renewable energy project development is likely to slow down. In order for the State to meet it's 90% by 2050 total renewable energy goal, it is important for the Standard Offer Program to continue to thrive and meet the annual 8 MW goal as intended by the legislature.