

Clean Energy Springfield

Recommendations for CWLP Energy Policy Act Standards

Fuel source reliance (or fuel diversity)

We endorse CWLP's recommendation that it adopt this standard in light of the city's recent wind power purchase. We request the following modifications.

- Pursuant to this standard, CWLP will conduct a planning process, using its existing and expanded community outreach efforts, to identify how the city wants to pursue fuel source diversification.
- CWLP will use its Green Power Program (established by ordinance 721-11-06, exhibit A, part 4) as a method for diversifying its fuel sources. One outcome of the planning process above should be a 10-year participation goal, expressed in MW of capacity.
- CWLP will include tools for reducing customer electricity use, such as non-electrical renewables (like solar water and air heaters) and its energy efficiency programs, in its plans for fuel source diversification. One outcome of the planning process above should be 10-year installation goals for non-electrical renewables and a 10-year savings goal for its energy efficiency programs.

Smart metering (or time-based metering)

We endorse CWLP's recommendations for smart metering for commercial customers.

We recommend that CWLP adopt the time-of-use metering standard for residential customers, with the following modifications:

- Once a commercial smart metering program has been established, CWLP will prepare a plan for a residential smart-metering trial program for existing residential buildings.
- Once a commercial smart metering program has been established, CWLP will prepare a plan for requiring that all new residential development be smart metered, including information programs and other tools to assist builders and developers in planning for this new style of metering.
- CWLP will, as appropriate, promote smart metering as a tool to encourage net metering.

Net metering

We endorse CWLP's recommendation to adopt this standard, with the following modifications: CWLP will develop a net metering plan that includes:

- appropriate incentives to encourage initial customer participation in net metering,
- a method for determining a limit for net metering generating capacity based on that customer's demonstrated annual energy consumption,
- a determination of the appropriateness of using smart metering technology to promote and appropriately compensate net metering customers,
- how energy generated by the customer beyond the customer's energy use during the billing period will be paid out or carried forward, and

- how to bill net metering customers for their portion of CWLP's fixed infrastructure costs.

Interconnections

We endorse CWLP's recommendations, but recommend the following additions:

- On an ongoing basis, CWLP should review other IEEE and utility standards for interconnecting customer sites with more than 1 MVA aggregate total generation, with a goal of allowing such interconnections if customers express an interest in them.
- On an ongoing basis, CWLP will monitor how its interconnection standards encourage or discourage interconnections, particularly for small-scale net metering customers, with a goal of encouraging net metering of renewable energy system.

We also encourage CWLP to make the maintenance and performance review requirements more explicit, particularly as these apply to small-scale net metering customers.

Fossil fuel generation efficiency

We endorse CWLP's recommendations.



Clean Energy Springfield,

Contact: Greg Claxton
816-3193
claxton6@gmail.com