From: **Mary Graham**
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CASE 05-M-0090

I am writing in support of extending the SBC. In particular, I would like to ensure that the SBC is used to address gaps in the implementation plan for the Retail Renewable Portfolio Standard.

I support the updated goals of the SBC, with their emphasis on distributed and renewable electric generation.

GAP IN THE RPS IMPLEMENTATION PLAN

The current procurement plan for the RPS is skewed heavily toward large-scale production by large companies with the resources and infrastructure to pursue Main Tier contracts. The allowance for a small number of customer-sited installations via net metering is more conducive to some technologies (solar) than others (wind). Because there is a pronounced economy of scale with wind energy, and limited appropriate sites, there are few instances where net metering is sufficient to make wind energy viable for residential applications. There is currently no mechanism for a group of people to get together, install a wind turbine that would meet their collective needs, and share the proceeds.

REASONS TO SUPPORT COMMUNITY WIND PROJECTS

Community-owned wind projects are more likely to be accepted by those living near generating facilities than large commercial projects that benefit only outsiders.

Community wind projects are an effective way to meet both distributed
generation and renewable production goals for electricity (whereas small wind installations are

economically viable in far fewer cases).

USE OF ELECTRICITY FEED LAWS

European countries have used simple feed laws since the early 1990s with excellent results. Denmark and Germany started out with payments of 85% and 90%, respectively, of the retail price of electricity. Denmark's wind development has slowed since the feed laws have been phased out in favor of a credit trading program. Germany, on the other hand, has continued good results by refining the feed laws to provide a fixed price for a fixed time period. In the United States, Washington State has recently passed an electricity feed law for photovoltaic solar generation.

BENEFITS OF ELECTRICITY FEED LAWS

Feed laws are simple mechanisms that equalize the playing field. They put small companies and individuals on the same footing with larger companies by simplifying access to incentives. An expensive bidding process is not required.

Removal of the limiting tie to a single meter encourages more efficient sizing and siting of wind projects, allowing even small groups to take advantage of economies of scale.

In implementations around the world, electricity feed laws consistently provide markedly better results in stimulating renewable energy development than quota systems that require bidding or trading of credits.

CONCLUSION

The limitation of the current electricity feed law to net metering for individual meters prevents the development of the part of the wind market most likely to contribute to RPS and SBC program goals. SBC should address this gap by expanding the electricity feed law beyond net metering to allow community wind development (up to 1000 KW).

Sincerely yours,

Mary Graham