December 10, 2013

VIA EMAIL

State Regulation of Public Utilities Review Committee
Energy Advisory Council (EAC)
Post Office Box 142
Columbia, South Carolina 29202
purc@scstatehouse.gov

Re: Distributed Energy Resources Initial Draft Report

To whom it may concern:

Conservation Voters of South Carolina (“CVSC”) is providing input to the State Regulation of Public Utilities Review Committee Energy Advisory Council (EAC) on the Distributed Energy Resources Initial Draft Report. CVSC is an organization dedicated to making conservation and environmental issues a top priority among South Carolina’s elected leaders, political candidates, and voters. CVSC takes great interest in addressing actions that can encourage efficient and clean energy generation in South Carolina.

CVSC appreciates the hard work of the EAC in developing this report. Addressing the legal and policy issues that prevent South Carolinians from taking advantage of solar resources is paramount, and we applaud the EAC’s analysis in the draft report. We particularly appreciate the EAC’s recognition of the gravity and far-reaching scope of the task:

“As a State, we are poised on the edge of a sea change that requires proactive policymaking and the Energy Advisory Council (EAC) recognizes that it will be best to ride the crest of the distributed-generation wave in a proactive rather than reactive way. How state policymakers structure the legal, regulatory, and economic environment will be critical in setting the stage for successful development and promotion of distributed generation in South Carolina.” (p. 1)

In order to effect this broad change, CVSC recommends the following minor changes. First, the EAC should provide additional outreach materials to accompany the final report. The Executive Summary and the appendices help to explain the complex technical and legal issues involved in distributed generation to the public, and the EAC could expand on these efforts through fact sheets and power point presentations in order to increase the impact of the final report. Second, the EAC could compare South Carolina with other states and their experience with distributed generation. States are the laboratories of democracy, and we could learn from what other states like Georgia have done recently in this area. We appreciate the comparisons to North Carolina; more detailed analysis could be helpful. Third, the EAC could discuss military bases, churches, and non-profits and distributed
generation, specifically the role of third party sales. South Carolinians should be able to fully take advantage of available federal incentives for clean energy.

CVSC appreciates your consideration of these comments. We look forward to helping implement the final report through our uPowerSC initiative, a cooperative effort with the South Carolina Wildlife Federation, that works with partners throughout the state to educate and engage citizens in a meaningful way about the energy policy choices that impact consumers every day. If you have any questions, please feel free to contact me by email at ann@cvsc.org or by telephone at (803) 799-0716.

Sincerely yours,

[Signature]

Ann Timberlake
Executive Director