

April 1st, 2019

DC Zoning Commission

441 4th Street N.W., Suite 200S

Washington D.C. 20001

*MDV-SEIA Testimony on Case No. 19-04 – Community Renewable Energy Facilities*

Dear Chairman Hood,

On behalf of the Maryland, D.C. Delaware Virginia Solar Energy Industries Association (MDV-SEIA) I am writing to urge the Zoning Commission to uphold the emergency zoning text amendment approved on February 11th permitting Community Renewable Energy Facilities (CREFs) as a matter-of-right in all zones. MDV-SEIA is the regional trade association representing the solar industry in the District of Columbia, including developers of CREF projects, several of which benefit the Solar For All (SfA) program.

We appreciate the Zoning Commission's adoption of the emergency zoning text amendment put forth by the Office of Planning. MDV-SEIA wholeheartedly supports the testimony submitted by the DC Department of Energy and Environment (DOEE) explaining the benefits of CREFs to SfA recipients and in meeting the District's ambitious renewable energy targets. The Clean Energy D.C. Omnibus Amendment Act of 2018 requires 10% of the District's energy supply to come from solar energy by 2041. CREFs play a crucial role in expanding the benefits of solar energy to District residents in all eight wards and efficiently maximizing the District's limited roof space.

MDV-SEIA is currently working in other capacities to address permitting barriers associated with CREFs. The utility-use designation would completely stall the progress of projects currently under development, putting both public and private capital at risk. DOEE anticipates 10 MW of community solar projects funded through the SfA program this year alone. SfA projects are required to adhere to a deadline in order to secure financial reimbursement for projects and a delay in moving projects forward due to permitting would jeopardize the success of the program.

The original emergency zoning text amendment language defines a CREF as a "...community solar energy system financially funded in whole or part by the Department of Energy and Environment". It is important to note that while all SfA community solar projects are CREFs not all CREFs are a part of the SfA program. There is no fundamental difference that would impact zoning between CREFs benefiting SfA recipients and other community solar projects. We strongly urge the Zoning Commission to insure the DOEE funding distinction is permanently removed from the CREF definition to include all community solar development.

The best path forward for achieving the District's sustainability goals supported by the Mayor, increasing solar job growth, and ensuring a healthy SfA program is to uphold the text proposed in the zoning text amendment. MDV-SEIA appreciates the Zoning Commission's attention to this issue and is available to answer any questions you may have.

Respectfully,

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Submitted on 4/1/2019 by:

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