



July 25th, 2019

Anthony J. Hood
Chairman
DC Zoning Commission
441 4th Street, NW, Suite 200S
Washington, DC 20001

RE: ZC Case 19-04 – Proposed Text Amendment to Subtitles B, C, H, K, and U of Title 11 DCMR, ZONING REGULATIONS OF 2016 – Defining Community Solar Facility (CSF), Locating Zones in which a CSF is a Permitted or Special Exception Use, and Establishing Development Standards for a CSF

Dear Chairman Hood:

On behalf of SaveSolar Corporation (“SSC”), I am writing in support of the final text amendment and proposed rulemaking to the Zoning Regulations regarding community solar installations.

SaveSolar is a Washington D.C. based organization that specialize in developing Community Solar assets. We work with building owners to finance and build solar assets, compensate them with long-term revenue, and generate solar energy back into the utility. This energy is then provided at a discount to Low Income, Residential Community subscribers. Our mission is to help our district reach its renewable energy goals and lower the cost of electricity. We have played an active part submitting projects for the 2018 program and assisting other grantees by providing services to manage their CNM energy credit distribution requirements.

SaveSolar was established specifically to serve low-income residents across the district. The classification of Solar Community Renewable Energy Facilities (CREFs) as a “Basic Utility” under the Zoning Regulations and the additional height and setback requirements in the use permissions in the proposed rulemaking present an ongoing challenge to our business when aiming to maximize the available real estate within low-income developments.

As an organization that has submitted projects as part of the Department of Energy and Environment’s (DOEE) Solar for All (SfA) program, we work with many low-income developers who can utilize space around their buildings to maximize solar production, which in turn generates renewable energy that is provided directly to low-income residents.

The addition of setback requirements in residentially zoned areas (R, RF and RA-1 zones) provides a significant challenge to constructing CREF facilities – particularly “carport canopies” which can generate renewable energy for localized, or District residents. These carport canopy CREF’s are also able to be submitted to the DOEE for Solar for All consideration, and with the setback restriction in place, we are forced to remove many of these CREF facilities from development consideration.

Recently, we were required to remove a planned CREF carport canopy from our grant submission with Enflexion (a 2018 grantee) due to the change in the setback requirements as part of the amendment. The energy from this canopy would otherwise have lowered the energy bills of around 20 low-income residents by 50% for a 15 year period.



Our current pipeline also has a number of carport canopies planned for installation across the District. Retaining this setback requirement would exclude these from any future development.

SaveSolar is committed to working with the Zoning Commission to overcome this obstacle and we welcome the opportunity to develop a zoning pathway commensurate with the District's solar energy goals and which will not impede the District's growing solar industry.

Kind regards,

Karl Unterlechner

Karl Unterlechner, CEO & MDVSEIA Member

SaveSolar Corporation