



121 Broadcommon Rd, Bristol, RI 02809

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Dana Goodman  
dana@nec-solar.com  
401-307-1447

April 24, 2025

RE: House Bills # 5580:

To the Committee Clerk, Louis Mansolillo and Members of the House Corporations Committee,

Please accept my testimony and positions on the aforementioned bill for careful consideration, with regard to my experience and expertise.

I hold a Master's degree in Environmental Science and Policy from Clark University. I am a renewable energy professional with 10 years of experience in the residential and commercial solar industry. I have helped hundreds of clients purchase solar systems for their homes and businesses, as well as helped them understand Net Metering and the "why" behind system sizing limitations.

The proposed bill reforms I support:

1. Page 3, Lines 18-19, *"For any system with a nameplate capacity equal to or less than twenty-five kilowatts (25 kW), eligibility shall not be restricted based on prior consumption."*
  - a. Reason: Limitations on net metering are in direct opposition to the goals of the Act on Climate. We need more renewables on the grid and getting rid of unnecessary limitations to sizing is critical to meet growing demand for clean energy. In my experience, people want to be able to future-plan for electrification upgrades like heat pumps, minisplits, AC units, EVs, and new water heaters, as well as future plan for adding appliances or home features like hot tubs, pools, ADU's, garages, renovations, and in-law apartments. **People want to go solar ONCE.** An average solar system can last between 25-50 years depending on panel quality and installation workmanship. We actually have no idea how long it takes for a modern solar system installed within the last 5 years to "die" completely, since the technology has become so powerful and durable.
  - b. It is extremely distressing for a client to hear that they have to limit their system size when they have plenty of roof space and ambitious future plans. The idea of "adding more panels later" is stressful and confusing, and the reality of retrofits is costly to home and business owners, unnecessarily impacting our local community. I have had many clients have to limit their system size and add panels later and the technology moves fast enough that people can end up with mis-matched panels, or incompatible inverters. This hurts the reputation of the solar industry through no fault of our own.
  - c. Allowing building owners to future plan for electrification and energy efficiency improvements will positively impact our entire community, help us meet Act on Climate goals, and will contribute positively to our local small business economy.



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2. Page 4, Lines 31-33, “, except for any system with a nameplate capacity equal to or less than twenty-five 32 kilowatts (25 kW) for which excess renewable net-metering credit applies to all production of electrical energy beyond one hundred percent (100%)”
  - a. Reason: Building owners who are able to net meter ALL of their excess credits are more likely to install larger systems thus contributing more renewable energy to the grid, and are able to future-plan for building improvements. Covering over 100% of their energy usage with an installed system also helps protect building owners against seasonal and annual weather variability which can affect solar production values. Once someone’s electricity consumption is controlled and cost-fixed with solar, it provides them with more free cash and spending power in the local economy.

The proposed bill reforms I recommend for reconsideration:

1. Page 5, Lines 9-20, “For electrical energy produced greater than one hundred percent (100%) of the renewable self-generator’s own electricity consumption at the eligible net-metering system site or the sum of the usage of the eligible credit recipient accounts associated with the community remote net metering system during the applicable billing period, excess renewable net-metering credits shall be equal to the wholesale electricity rate, which is hereby declared to be the ISO-New England energy clearing price. When applying the ISO-New England energy clearing price to calculate the value of excess renewable net-metering credits, **the electric distribution company, subject to commission approval and subject to amendment from time to time, may use an annual average, monthly average or other time increment and may use Rhode Island zone pricing or other applicable locational pricing.** The commission shall have the authority to make determinations as to the applicability of this credit to specific generation facilities to the extent there is any uncertainty or disagreement.”
  - a. Reason: I’ve highlighted the most problematic terms in bold. This suggested change is unfair to building owners who have invested their own funds, time and effort into putting renewable energy on the grid, plain and simple. These non-specific time definitions are extremely loose and lend to the opportunity for the electric distribution company to willfully put their own interests before that of the net metering customer which is unethical, given that the net metering customer deserves to be fairly compensated for the energy they have invested to create. **The timely average needs to be specifically defined**, in order for net metering customers to be fairly compensated. If it is at the will of the distribution company they will obviously choose the timeframe during which ISO clearing prices were at a lower average without customers being privy to that knowledge. There absolutely needs to be transparency and clearly defined timelines and compensation rates for net metering credit recipients. **My recommendation is to commit to annual average pricing with Rhode Island Zone**



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**pricing only.** I disagree with Wholesale pricing to begin with, I think it should remain Last Resort Service rate, but if that is a consolation we need to make to get this bill passed, it needs to be fair and clearly defined.

2. Page 10, Lines 27-29, "...*Provided that, for any excess electricity generated by a system with a nameplate capacity in excess of twenty-five kilowatts (25 kW), excess renewable net-metering credits shall be limited to excess...*"
  - a. Reason: This section of the new bill creates a new limit on net metering of 125% usage for systems sized OVER 25kW. This is in direct opposition to the current net metering and system sizing rules and will significantly damage the commercial-scale solar industry economy. Any commercial job of this size depends on economies of scale, so if you can't scale up the project you create a significant roadblock to making the project financially viable. Once again, this also is in direct opposition to the state's goals in the Act on Climate. We need MORE renewable energy on the grid, and we need it now, plain and simple. These sizing limitations do nothing of benefit to the community.

In summary, I support a net metering bill that lifts sizing limitations completely, and allows for us to aggressively pursue electrification, energy efficiency, renewable portfolio standards, and Act on Climate goals for the state of RI. The technology is here, it works fabulously, and it's simply waiting to be implemented and deployed. The only thing holding us back from a 100% renewable Rhode Island is net metering system size limitations. We were supposed to be aiming for 100% renewable by 2033. That is EIGHT YEARS away. There is no way we will get there with the continued insistence on system size limitations. It's ridiculous. I see the power of solar every single day, and I know we can make RI the first 100% renewable state.

Thank you for your attention to my testimony on these bills.

Regards,

Dana Goodman

Dana Goodman, MA, Environmental Science and Policy

Solar Consultant and Outreach Program Director, NEC Solar