

April 23, 2025

Representative Joseph J. Solomon  
Chair of House Corporations Committee  
82 Smith Street  
Providence, RI 02903

**RE: ACT Comments on House Bill 5580- Net Metering**

Dear Chair Solomon and Members of the Committee,

The Alliance for Climate Transition appreciates the opportunity to submit comments regarding House Bill 5580, Net Metering. While we appreciate some parts of this bill, we believe it could be further improved with a few additions and changes. ACT supports this bill's prohibition of limiting consumer eligibility based on prior consumption. We also support allowing systems under 25kW to recoup the value of all the energy produced over 100% of their usage. We propose the following amendments to optimize the program further:

1. **Replacing the ambiguous language of "applicable billing period" to the clearer "applicable annual billing period."** This would ensure consistency with recent rulings from Public Utilities Commission docket 23-05-EL, preventing potential future confusion in how the Net Metering program should be administered.
2. **The Net Metering program should not change the value of solar production over 100%.** The bill's proposed change to the value of solar energy produced above 100% of usage to wholesale rates will result in losses for solar system owners who expected consistent rates. This change will also complicate accounting by requiring more meticulous calculations of the value of energy credits if a single solar system produces credits of two different values. These issues are particularly significant for residential consumers, whose overproduction is minimal relative to the total system load.

On behalf of our members, thank you for your consideration and dedication to forging progress on clean energy and climate issues in Rhode Island.

Sincerely,



Oliwia D. Krupinska  
Policy and Regulatory Analyst  
[okrupinska@joinact.org](mailto:okrupinska@joinact.org)