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TO: RENEWABLE ENERGY STANDARD REFORM WORKING GROUP
FROM: KATHY BEYER/SVP REAL ESTATE DEVELOPMENT
SUBJECT: NET METERED SOLAR FOR AFFORDABLE MULTIFAMILY HOUSING
DATE: NOVEMBER 1, 2023

Thank you for the opportunity to provide comment to the working group.

Evernorth is a nonprofit affordable housing developer working in Vermont, New Hampshire and Maine. We build sustainable, energy-efficient buildings and are always working to implement creative new approaches to reducing the carbon footprint of our buildings and utility burdens on our residents. With 35 years of experience and a portfolio of 3,730 units in Vermont, we take our role as industry and climate leaders seriously.

Our rental housing serves a much lower income population than the homeownership population; of the 6,600 residents living in our 3,500 apartments, 89% of these residents have incomes below 60% of median income.

As a critical next step to wean our buildings off fossil fuels and enable our residents to benefit from the cost- and carbon-saving benefits of solar power, we are working to build out our access to community solar. A multifamily community solar approach allows affordable housing owners to surmount challenges that currently prevent access to this clean energy source, including roof size, project budget, and grid constraints. It also leverages substantial economies of scale that are not achievable at our projects that can support solar, many of which have fewer than 30 units and limited roof space or land to support solar.

Solar power is an integral part of our clean energy future but clean energy does not necessarily ensure an equitable energy future. Historically, the benefits of solar PV have been concentrated in higher income single family homeowners; renters, and in particular, low-income renter households have not had access to the benefits of solar power.

This happening at a time that when state energy policy is also driving Evernorth and our nonprofit partners to electrify our buildings with heat pumps. In natural gas territory, the heating costs for an electric building are 30% higher than a traditional natural gas system. If we are being asked to electrify our buildings for climate change reasons, during what is also a time of a housing crisis, these buildings must be paired with solar.

For a single family home, the solution is straight forward: panels on the roof can often offset most of the electric costs. For a multifamily building, that is not the case for a simple reason: there is not enough roof space for the panels. The roof of a multifamily building is often populated with the condensers for the heat pumps, and ERV equipment. In existing buildings, the roof design may not be able to accommodate solar, or historic preservation standards may limit the number of solar panels. .

100 Bank Street, Suite 400, Burlington, VT 05401
Phone: 802.863.8424 Fax: 802.660.9034

120 Exchange Street, Suite 600, Portland, ME 04101
Phone: 207.772.8255 Fax: 207.772.8241

evernorthus.org

In a typical multifamily building, a roof-top array can only offset 20% or less of the building's electric load. To offset the load of a multifamily building, there must be an off-site alternative. A net metered system may be the only avenue available for off-site solar.

We ask the RES Reform Working Group to consider legislative language that would change the definition of "Preferred Sites" to include 500kW systems that are net metered to affordable housing serving the LMI renters or homeowners. We also ask the Working Group to consider raising the cap, from 500kW to 1MW for these systems.

You may be asking, is this discussion relevant to the RES update work. I would ask, where in the state's renewable energy policy are we addressing the inequities of connecting the benefits of solar to our LMI households, and especially to our LMI renter households. The 2022 Comprehensive Energy Plan includes a section on energy equity and notes that in designing our energy policies, we must *"ensure that all communities, particularly those who have been underserved, have access to renewable and low-carbon energy opportunities such as electric vehicles, cold climate heat pumps, solar PV and weatherization..."*

We are aware of the ongoing debate about the potential cost-shift of net metered systems to rate payers. But in having that discussion, one must also ask what are we doing to ensure equal access to solar PV for LMI homeowners and renters in Vermont.