



May 6, 2016

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue N.W.
Suite CC-5610 (Annex B)
Washington, DC 20580

RE: Solar Electricity Project No. P161200; Something New Under the Sun: Competition & Consumer Protection Issues in Solar Energy

Dear Secretary Donald S. Clark:

On behalf of our nearly 300 corporate members and more than 400,000 individual members, Consumer Energy Alliance (CEA) seeks to provide comment and guidance on the Federal Trade Commission's Competition & Consumer Protection Issues in Solar Energy workshop. As a consumer advocacy organization, CEA seeks to ensure that all American energy consumers have access to affordable, reliable energy. CEA believes that solar has a prominent place in America's energy mix through energy policies that are pro-solar, pro-grid, and pro-consumer. By seeking ~~after~~ policies that achieve these three fundamental principles, each and every American can equally realize the benefits of the sun's energy generating power and potential.

Accordingly, we ask that the FTC consider the following during the workshop:

CEA supports government and private industry efforts to deploy solar technology and energy to Americans in their homes, businesses, and communities at the most affordable rates possible.

CEA further supports policies that allow solar to penetrate energy markets at an accelerated rate, such as bill credits wherein private solar customers can sell excess energy to the utility. CEA urges the FTC to engage in a way that allows such programs to be conducted at a rate that benefits solar consumers and acknowledges the real costs of grid maintenance and power transmission. Solar incentives can support the rapid and sustainable growth of solar energy sources when done thoughtfully and at rates that balance the needs of all customers.

According to the Solar Energy Industries Association, the costs of producing solar energy have declined over the past several years. Yet in that time, net metering policies have not been revisited to reflect this impressive shift in the marketplace. The original intent of such incentives was to create value for early adopters and spur solar deployment, which have been successfully achieved. CEA supports the continued use of such policies but at rates that provide fair return on investment without asking lower income consumers to facilitate solar installation on another's rooftop.

When setting rate policies, CEA encourages the FTC to consider the fact that private solar deployment does not reduce the ongoing need to investment the electric grid, which ensures reliable electricity for each connected customer. This is particularly true for American businesses and manufacturers who rely on affordable, reliable energy supplies to make business decisions and to ensure uninterrupted



productivity. Low cost, reliable energy also ensures that manufactures and other business are able to remain competitive in an increasingly competitive, global market.

In its infancy, energy markets depended upon incentives to encourage the rapid deployment of solar electricity. Now that these programs have been successful, CEA encourages the FTC to ensure that a vibrant solar market and grid emerge together by encouraging federal and state level policymakers to recognize and protect the value of the grid for all customers who rely on it for basic life necessities. CEA, therefore, encourages the FTC to foster a market environment that facilitates updated credit and rate policies that ensure reliable and affordable electricity for all consumers. Updated policies need to reflect the reality that everyone who connects to the power grid, even if they only connect to sell power, equitably share the costs of maintaining it.

CEA further urges the FTC to adhere to its chartered mandate of protecting competition and to keep trade fair for all competitors. Paying solar customers unfair rates for the power that they generate and sell back to utilities favors one group of competitors and increases costs for all customers. American consumers, businesses, and manufacturers strongly rely on and are supported by competitive markets and competitive prices – which unfair rate policies work to eliminate.

In closing, CEA urges the FTC and those who participate in its Competition & Consumer Protection Issues in Solar Energy workshop to recognize this pivotal juncture in America’s energy future. CEA asks the FTC to recognize their opportunity to work with stakeholders and industry groups to truly realize the value solar power can bring to each and every American, to ensure that the electric grid remains reliable, and to ensure that consumers have access to fairly priced, affordable energy supplies. Indeed, CEA urges the FTC to pursue energy policies that are pro-solar, pro-grid, and pro-consumer.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Holt", is written over a horizontal dashed line.

David E. Holt
President, Consumer Energy Alliance