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LD 1026

Regarding the changes to the NEB program contained within LD 1026, Norwich Solar respectfully submits the following points for consideration:

1. In determining NEB tariff rates, using a standard related to a project's interconnection agreement status would be more congruous with past legislation than using a "physical work of a significant nature" standard. As the committee knows, physical work can be stalled for years by long utility timelines. Developers should have stable metrics that they need to achieve to protect their projects, and utility timelines should not be used to trim the NEB program.
2. In determining NEB tariff rates, dates later than 1 September 2022 should be considered for the cutoff. This would provide developers and project owners more time to adjust to program changes.
3. A higher annual rate escalator should be considered which reflects the rapidly increasing costs of labor, materials, and financing.
4. Lastly, after two years of significant changes to the NEB program, it is important to provide clear signals of stability for the program to achieve its goals. The program should be allowed to continue in its current form, especially as many projects are still in cluster studies and there is no successor program established.

Thank you for the opportunity to submit testimony.