



April 30, 2019

Martha Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

RE: NCUC Docket No. E-100, Sub 90
NC GreenPower program revision

Dear Ms. Jarvis:

On November 26, 2018, NC GreenPower submitted a revised program plan for the NC Utilities Commission (NCUC) to consider for approval; this submission followed Duke Energy's filing of their new Renewable Advantage (RA) renewable energy certificate (REC) program which was later withdrawn on February 7, 2019.

Duke Energy has modified and refiled RA on April 18, 2019, adding a REC product option for their non-residential customers. An update to NC GreenPower's program plan has been made with approvals by the Boards of Directors for both NC GreenPower and Advanced Energy on March 21, 2019 and March 29, 2019 respectively.

We hereby submit our revised program plan to the NCUC and Public Staff for your review and approval. NC GreenPower appreciates the support and feedback from the NCUC, its staff and the Public Staff and welcomes any questions you may have.

Sincerely,

Robert H. Goodson
President

cc: NCUC Commissioners
NCUC Public Staff
Sam Watson
Kim Duffley

Summary of Proposed Program Changes

Docket #E-100 Sub 90
April 30, 2019

In early 2018, working in parallel with Duke Energy's plans for their own Renewable Energy Certificate (REC) program, NC GreenPower developed a program to replace the "50/50 Hybrid" pilot with a permanent Solar⁺ Schools initiative. Solar⁺ Schools was filed with the NC Utilities Commission on November 26, 2018.

November 2018 Program Filing

In the new program proposed last fall, the \$4.00 Mass Market (MM) REC product (that had allocated half of the donation to support in-state renewable energy projects and half to support Solar School grants for the installation of educational solar PV packages at NC K-12 schools) would be terminated. Instead of dividing those funds for two initiatives, the Solar⁺ Schools program would end the \$4.00 MM REC product and small solar generator incentive, allowing NC GreenPower to focus on providing donations for solar PV packages to schools. By directing the full \$4.00 contribution to Solar⁺ Schools, the program would allow more schools an opportunity to receive grant funding.

The \$2.50 Large Volume (LV) REC product would be renamed as the "Clean Energy Supporter" REC product to better reflect the donors who support it. The minimum monthly purchase will be reduced from 100 blocks of 100 kWh each (or \$250.00) to 40 blocks of 100 kWh each (or \$100.00). Donations for this product will continue to support in-state renewable energy generators.

There were no proposed changes to the Carbon Offset and Brokered Bid products. Donors may continue contributing to support local carbon mitigation projects. Large consumers will still be able to donate towards and/or purchase RECs and Carbon Offsets through the Brokered Bid product (minimum annual purchase of \$15,000), as well as consumers who purchase for event offsets and to earn LEED points.

All donations to Solar⁺ Schools will continue supporting only North Carolina projects.

Additional Board-approved program changes included:

- **Updated definition of “new” renewables.** NC GreenPower revised the definition of “new” renewables to align with the Center for Resource Solutions Green-e standards’ definition: Green-e certified generation in a particular Reporting Year, requires the generator to have first come online or undergone certain changes within the past 15 calendar years (inclusive of the Reporting Year).
- **Increased grant amount for school solar systems.** Depending on the type of solar PV system installed, NC GreenPower’s Board of Directors may adjust grant funding to reduce the financial burden on the school.
- **Allowing roof-mounted arrays in prominent areas.** NC GreenPower will permit the installation of roof-mounted arrays only in very prominent sites that are clearly visible to the general public (e.g. front of the school) and also have access to ideal solar conditions.
- **Program expenses will include more tasks.** As approved by NC GreenPower’s independent auditors and Board of Directors, at least 75% of donations will be used to support various program-related costs. No more than 25% of donations will be used to pay for administrative costs.
- **Updated fundraising options.** If a school is not successful in reaching their fundraising goal, they have three options:
 1. Request a 30-day extension to continue fundraising
 2. Decrease the size of solar PV array
 3. If options 1 and 2 have been granted and there are insufficient funds to install a small solar PV array, NC GreenPower will use the funds to purchase renewable energy educational materials/kits for the school.

Upon launching the new Solar⁺ Schools program, existing donors that were supporting NC GreenPower’s \$4.00 MM RECs would automatically have their funds transferred to support the Solar⁺ Schools program. If contributors do not wish to support the Solar⁺ Schools program, they can contact NC GreenPower or their electric utility to “opt out” and cancel their donation.

Program Process

Using donations as funding, NC GreenPower will provide a grant for a 3-5 kW single-pole, top-of-pole or roof-mounted solar package. For multiple-pole, top-of-pole arrays, the grant amount may increase to reduce the fundraising burden on the participating school that is responsible for raising the remaining balance.

All NC K-12 schools are eligible to apply, with preference given to those schools with greater need, such as those located in Tier 1 counties (areas in greatest economic distress), Title 1 schools, etc. NC GreenPower's Review Committee will evaluate applications and select schools to receive the grant.

NC GreenPower will retain a small fee from each school's fundraising to cover a portion of our costs as directed by the NC GreenPower Board of Directors; all remaining funds will be used to support the solar PV project at the school. Qualified solar installers who meet specific program requirements will be chosen to construct the projects with NC GreenPower overseeing the entire installation process. Installers will assume all liability for the proper construction and operation of the educational solar PV system.

NC GreenPower provides educational curriculum from an accredited organization, such as the National Energy Education Development (NEED) Project, to fully maximize the benefit of having the system as a teaching tool. Three to five teachers per school are required to attend a day-long curriculum training led by a NEED instructor and paid for by NC GreenPower program funds. Solar installers will demonstrate basic operation/maintenance (O&M) for the solar PV system to teachers and school staff.

NC GreenPower will hold all contributions and pay the installer upon satisfactorily completing the installation of the solar PV system. Completed projects will display signage with recognition of NC GreenPower and other supporters. A press release and school event will be offered to celebrate the success of the project and further promote the program.

All donations to NC GreenPower, including those given to a school's campaign, are tax-deductible and will be used to support only in-state projects.

April 2019 Program Filing

This filing for the revised Solar⁺ Schools program contains most of the same details as the November 2018 version with the following exceptions:

- The \$4.00 MM product from the current 50/50 Hybrid pilot will not be terminated as previously filed. Instead, it will continue to be offered to non-Duke Energy customers with some revisions:
 - Each donation will continue to support both North Carolina RECs and solar installation packages at K-12 schools, but not at the 50/50 split
 - A portion of every donation will support in-state RECs and the block size will increase from 50 kWh to 125 kWh
 - The balance of each donation will continue to support solar projects at schools.
- For Duke Energy customers who currently donate to the \$4.00 MM product, the contributions will be changed to solely support Solar⁺ Schools and not REC projects; these customers may “opt out” if they do not wish to support the schools initiative.
- The block size for the \$2.50 LV REC for Clean Energy Supporters will increase from 100 kWh to 250 kWh.
- NC GreenPower’s Board of Directors may adjust grant amounts depending on the type of solar system installed (top-of-pole versus roof-mounted) and the economic need of the school.

Solar⁺ Schools Program Timeline

This revised Solar⁺ Schools program will be filed with the NCUC in April 2019. If it is approved, the program is expected to launch in the third quarter of 2019, in conjunction with the Duke Energy REC program. As it has in the past, NC GreenPower will monitor the success of the new initiative and track program and administration costs. The initial goal for the program will be to have a minimum of five (5) projects successfully funded each year. Any adjustments to make the program more successful will be made with the Board of Directors’ input and filed with the NCUC as necessary.

A chart summarizing the changes (shown in **blue font**) between the current 50/50 Hybrid pilot, the revised program plan filed in November 2018 and the program being filed in April 2019 is on the following page.

April 2015 - Current	Filed November 2018	Revised March 2019 (to be filed April 2019)
- \$4 Mass Market (res'l.)	- \$4 Solar Schools	- \$4 Mass Market (res'l.) – Solar Schools for DE, Hybrid for non-DE customers
- \$2 for 50 kWh	- No RECs offered to res'l. customers	- A portion of \$4 for 125 kWh for non-DE res'l. customers; No RECs offered to DE res'l. customers
- \$2 for Solar Schools	- \$4 to Solar Schools	- The balance of \$4 to Solar Schools for non-DE res'l. customers; All \$4 to Solar Schools for DE res'l. customers
- \$2.50 Large Volume (C&I)	- \$2.50 Large Volume (C&I)	- \$2.50 Large Volume (C&I)
- \$2.50 for 100 kWh	- \$2.50 for 100 kWh	- \$2.50 for 250 kWh
- \$4 Carbon Offset (res'l., C&I)	- \$4 Carbon Offset (res'l., C&I)	- \$4 Carbon Offset (res'l., C&I)
- 1000 lbs. offset	- 1000 lbs. offset	- 1000 lbs. offset
- Brokered Bids (RECs, Carbon Offsets)	- Brokered Bids (RECs, Carbon Offsets)	- Brokered Bids (RECs, Carbon Offsets)
- \$15,000 minimum annual purchase	- \$15,000 minimum annual purchase	- \$15,000 minimum annual purchase
- LEED Points, Event Offsets (RECs, Carbon Offsets)	- LEED Points, Event Offsets (RECs, Carbon Offsets)	- LEED Points, Event Offsets (RECs, Carbon Offsets)
- No minimum purchase	- No minimum purchase	- No minimum purchase