

1/29/22

## Public Comments on BIUD Proposed Tariff

My name is John Warfel, and I have been a year round resident on Block Island since 1981. I was the Tech teacher at the Block Island School for 29 years. I also was a building contractor and installed solar energy systems, both PV and hot water. I was a member of the Block Island Utility Task Force and am a newly elected member of the Block Island Utility District Board. I fully support our cooperative and have high praise for what Mr. Wright is accomplishing. Since the rate filing predates my election to the board, I am writing to you as a cooperative member/ratepayer.

I am not an expert but I have been involved with solar energy since the mid 80's. I built my house in 1984 and am on the 3rd generation of PV systems. My present system, thirty plus years later, shows the huge advancement in solar technology. My system is connected to the grid and can be set to run in four different modes, one of which is "net meter" and another, "zero export". In zero export, no energy produced is ever fed to the grid. This system has multiple safety features that ensure that no power is ever back fed into the grid if a grid outage occurs.

Now to my concerns. Contrary to Mr. Wright's opinion, zero export is not net metering. There is nothing net about it since no power is fed into the grid. It has the same effect on the grid as if a ratepayer installed energy efficient appliances or reduced his electrical energy consumption by any means. Any ratepayer should be able to install a zero export PV system without permission or interference from BIPCO, as long as appropriate permits are pulled and electrical codes are complied with.

Second, the Block Island Utility District Solar Meter Wiring Diagram shows that the solar production meter is in front of the consumer use meter. In this schematic, when the grid goes down, the homeowner's system would go down. Some ratepayers, like myself, have PV systems with battery backup. The main purpose of a battery backup system is to provide the homeowner with electricity when the grid goes down. If the PV production smart meter is in front of the consumer use smart meter, the homeowner would not have power in a grid outage. This is the main reason why ratepayers install PV systems with battery backup, which in my opinion is preferable to installing stand-by generators. At this time stand-by generators are unregulated and the number of installations is unknown. This could actually be a real danger to BIPCO's line crew when generators are not installed properly or are used beyond backup purposes.

Now to the purpose of the second smart meter that is directly fed by PV production. The stated purpose is to provide BIPCO the ability to shut down PV production in a situation where BIPCO is on diesel generation (when the cable is down) when, it is argued, high PV production might cause grid instability in winter months. I have not seen any calculations that support this position. In my opinion, and I am not a utility engineer, this is an unlikely scenario when we have a 10% PV penetration cap. This is especially true considering the concerns are in winter

months when PV production is way down. Maybe an energy storage system is a better way of handling this concern?

In summation, other modes of connecting PV systems to the grid besides “net metering”, need to be recognized. Homeowners who have installed net metered systems with battery backup need to be able to use their systems in times of grid outages. And is the rationale for the installation and positioning of the second meter justified by the stated possible scenario that BIUD describes?

Thank you for the opportunity to express my opinions in this rate case.

Sincerely,  
John Warfel  
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