



Office of the Ohio Consumers' Counsel

**Before
The Ohio House of Representatives
Public Utilities Committee**

Interested Party Testimony on Substitute House Bill 450

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On Behalf of the Office of the Ohio Consumers' Counsel**

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Hello Chair Hoops, Vice-Chair Ray, Ranking Member Smith, and Committee members. I hope you and your colleagues are well.

Consumers' Counsel Weston and I thank you and the bill sponsors (Rep. Lanese and Rep. Baldrige) for this opportunity to present interested party testimony on Substitute House Bill 450.

Renewable energy generally is a good thing. We appreciate the consideration of the issue.

But renewable energy is best enabled by the competitive market without subsidies from consumers and without utility cost-shifting to consumers. OCC's concerns include that HB450, with virtual net-metering for community solar, will result in utility cost-shifting and subsidies, at consumer expense. If subsidies and cost-shifting are not eliminated from HB450, then OCC respectfully opposes the bill.

HB450 allows participating consumers to be net-metered through their electric utility. With community solar this would technically be "virtual" net-metering. It is virtual because there is not a physical solar panel on the subscriber's house or business. The participating consumer is still using the full amount of generation and distribution services from the utility and will be given a credit at the end of the month for solar power generated elsewhere.

Community solar projects will reduce a utility's revenues through lower consumer (participant) energy usage. Utilities do not like to have their revenues reduced, and often find ways to collect revenue shortfalls from other consumers. This scenario, along with PUCO responsiveness to utility make-whole requests, may lead to non-participants being charged more for their electric service to subsidize the community solar program.

OCC has two amendment suggestions to protect consumers and avoid subsidies or cost shifting.

Section 4928.858 after line 236, insert the following:

“The commission shall confirm to the general assembly that non-participating customers have not been charged directly or indirectly any costs related to the offering of community solar programs including cost-shifting to non-participating customers.”

Section 4928.8512 after line 266, insert the following:

“The commission shall prohibit any cost-shifting to non-participating customers and prohibit any charging of non-participating customers to subsidize the community solar program.”

Thank you for your consideration.