In response to the discussions during Charrette #1, the Iowa Solar Energy Trade Association would like to submit the following comments for consideration.

1) In the discussion around the definitions of “stability” and “resiliency” the consultants should consider the manner in which distributed generation contributes to the stability and resiliency of the grid. The electrical grid that serves all Iowans is greater than just that operated by Iowa’s incumbent utilities, and therefore in considering how to maintain the stability of such a grid the Iowa Utilities Board and policymakers should look at and consider the added benefits distributed generation provides. A narrow view or scope of looking only at an incumbent utility fails to take into account other power generated across the customer market. Factors such as the minimization or elimination of “line loss”, local sources to support an area during an outage due to weather, etc., should be considered and encouraged.

Some pertinent arguments for weather related resiliency can be gleaned from lessons learned after Hurricanes Maria and Fiona in Puerto Rico, where distributed generation fed micro-grids which supplied power before and after the storms to the community of Castaner. 120 residences were able to maintain power and rebuild as people across the island struggled for months with basic services. Babcock Ranch, Florida is another example of “resiliency thinking.” An innovative community, the founders built solar as the source of power to the community to withstand major environmental challenges. When Hurricane Ian hit the SW coast of Florida in 2022, over 4 million Floridians lost power. But Bobcock Ranch’s residents’ lights stayed on, fueled by solar.

Closer to home, The Franciscan Spirituality Center in Cedar Rapids, Iowa hosts off-grid solar powered buildings. During the Derecho of 2020 when 400,000 Iowans struggled without power, many in Cedar Rapids for over a week, the Franscians were able to use power basic needs like refrigerators for food storage at the solar powered buildings on their grounds.

With weather extremes becoming more regular across the country and Iowa not being an exception, rolling blackouts during extremely frigid and particularly stark heat waves is a near possibility. Strengthening the grid with diversified power sources and connections should be investigated for stability and resilience for Iowans.
2) In the discussion around defining “adequacy” of laws for ratemaking should be responsive over time to changing economic conditions. The consultants should consider if laws and regulations around rate making have kept up with change in Iowa industry practices. Furthermore, such changing economic conditions must include technological changes that drive such conditions.

For example, prior to modern livestock production methods a farmer likely had one utility meter for their farm. As livestock confinement operations became the norm over the last thirty years livestock farmers installed multiple buildings for the different phases of raising hogs. As a result of multiple buildings being built, multiple meters were installed to serve the one farm entity. Yet for those livestock farmers that want to install a solar array to control their costs they are restricted by policies that have not kept up. The farmer is not allowed to maximize the efficiency of a single distributed generation system as they are required to install a separate unit for each building. From a technological or accounting standpoint that is not required. While other states have allowed an aggregated or “virtual” net metering to provide for that efficiency for the user, clearly, Iowa policy has not kept up.

Utility customers must continuously look for efficiencies in their business operations to remain competitive in a global marketplace. Ratemaking policies must therefore also keep up and be responsive to changing the economics and we would suggest technological changes to ensure Iowans remain competitive.

Respectfully,

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