## SOLAR UNITED NEIGHBORS OF TEXAS REQUEST TO PARTICIPATE

Pursuant to Procedural Guidelines Section B.2(b), Solar United Neighbors (SUN) of Texas, as ratepayers and on behalf of their many Texas members and supporters who are also customers of Austin Energy, respectfully submits this Request to Participate in the above-referenced proceeding, showing as follows:

1. The names, addresses, and telephone numbers of SUN's authorized representatives are:

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Texas Program Director
Solar United Neighbors of Texas
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All pleadings and other documents should be served upon SUN's authorized representatives.

- 2. On April 18, 2022, Austin Energy filed its Tariff Package which included a May 18, 2022 deadline for Requests to Participate.
- 3. SUN Texas Program Director and SUN of Texas member Hanna Mitchell is an Austin Energy ratepayer and will be impacted by the Impartial Hearing Examiner's recommendation to Austin City Council as well as Austin City Council's final determination regarding rates.

In addition, Solar United Neighbors is a non-profit organization representing customers of Austin Energy. SUN of Texas has run 10 solar co-ops to help people learn about solar and go solar together at a group price. We have educated thousands of Texans about solar and storage, and have helped 151 homes and small businesses install 1.4 MW of solar and 677 kW of battery storage combined. SUN of Texas has 115 members and 730 supporters within Austin Energy's service territory, who will also be impacted by the Impartial Hearing Examiner's recommendation to Austin City Council as well as Austin City Council's final determination regarding rates.

Therefore, SUN of Texas has a direct interest in the outcome of this proceeding and requests the opportunity to participate.

4. For the reasons stated above, SUN of Texas respectfully requests that the Impartial Hearing Examiner grant this timely Request to Participate and admit SUN of Texas as a participant in this proceeding for all purposes.

Based on our initial review of Austin Energy's Tariff Package, SUN of Texas believes that the Impartial Hearing Examiner should address the issue of how

distributed solar energy resources are valued in Austin Energy' latest Value of Solar report. We are concerned that the exclusion of certain benefits of distributed solar in this cost-benefit analysis and subsequent valuation will overestimate the net costs and underestimate the benefits of distributed solar. This could result in unfair and undue rates for distributed solar customers and could hinder continued adoption.

As the record develops and more information becomes available, SUN of Texas reserves the right to address additional issues that may arise, as well.

Respectfully submitted,

Hanna Mitchell

Texas Program Director

Solar United Neighbors of Texas

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