

Response to the Final IHE Recommendations by Solar and Storage Coalition (SSC)

In the Impartial Hearing Examiners Final Recommendation, issued on September 9, 2002, the IHE agrees with Austin Energy that Solar and Storage Coalition's (SSC's) programmatic recommendations involve issues beyond the scope of the Base Rate Review, but the IHE does acknowledge that "rates, methodology, and inputs" lack clarity. Accordingly, the IHE recommends that Austin Energy more clearly define the scope of the items that will be considered before the next reassessment of the VoS. Ultimately, the IHE finds AE's proposed VoS approach and tariff to be reasonable and appropriate and recommends approval.

Regarding the Value of Solar (VoS) Tariff generally, the IHE generally recommends that the VoS be calculated in accordance with AE's recommendation. However, the IHE recommends:

- (1) AE evaluate opportunities for additional public and stakeholder input in future VoS determinations, and
- (2) AE more clearly defines what comprises the "rates, methodology, and inputs" that must be reassessed consistent with AE's VoS tariff.

SSC disagrees with the IHE regarding scope and continues to believe that the recommendations offered by SSC fall within the scope of Value of Solar Tariff, as we are asking for changes to this tariff. SSC believes these issues should be resolved as part of the rate case or concurrently with it.

SSC agrees with the IHE that "rates, methodology, and inputs" is vaguely defined and agrees with the IHE that a better future definition and scope is beneficial. As argued in the SSC Closing Brief, the procedural guidelines state that "Value of Solar Rider rates, methodology, and inputs

will be reassessed during the 2022 Austin Energy Base Rate Reviews”. Several of our proposals ask for the expansion of the Value of Solar Tariff to include additional rates, which is clearly within the scope of “rates, methodology, and inputs”. Austin Energy’s own rate package includes proposed updates to rebate programs and a change to the funding source for Value of Solar.

Because Austin Energy continues to state that the proposals of SSC are outside the scope of these proceedings, SSC continues to ask that Austin Energy commit to exploring ways that they can incorporate storage into future Austin Energy rates and include stakeholders, such as SSC, in those discussions.

Consistent with this request, Austin Energy noted in their Closing Brief (in a footnote) that “At the appropriate time, AE commits to including SSC as stakeholders in the development of programs raised in its brief”.