

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

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August 27, 2019 - 10:08 a.m.
Concord, New Hampshire

RE: DE 16-576
ELECTRIC DISTRIBUTION UTILITIES:
Development of New Alternative Net
Metering Tariffs and/or other
Regulatory Mechanisms and Tariffs
for Customer-Generators.
(Hearing to receive public comment)

PRESENT: Chairman Martin P. Honigberg, Presiding
Commissioner Michael S. Giaimo

Sandy Deno, Clerk

APPEARANCES: Reptg. Eversource Energy:
Matthew J. Fossum, Esq.

Reptg. Unitil Energy Systems, Inc.:
Gary Epler, Esq.

Reptg. Liberty Utilities (Granite
State Electric) d/b/a Liberty
Utilities:
Heather Tebbetts
Anthony Strabone
Melissa Samenfeld
David Lepie

Court Reporter: Steven E. Patnaude, LCR No. 52

**CERTIFIED
ORIGINAL TRANSCRIPT**

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APPEARANCES: (C o n t i n u e d)

Reptg. Conservation Law Foundation:
Meredith A. Hatfield, Esq.

Reptg. New Hampshire Legal Assistance:
Raymond Burke, Esq.

Reptg. Clean Energy NH:
Madeleine Mineau, Executive Director

Reptg. Residential Ratepayers:
D. Maurice Kreis, Esq., Consumer Adv.
Office of Consumer Advocate

Reptg. PUC Staff:
David K. Wiesner, Esq.
Mary Schwarzer, Esq.
Karen Cramton, Dir./Sustainable Energy
Tanya Wayland, Sustainable Energy Div.

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P R O C E E D I N G

1
2 CHAIRMAN HONIGBERG: We are here
3 today in Docket 16-576, which is the net
4 metering docket. We're here on a Staff
5 recommendation to consider modifications to
6 Order Number 26,029, which was issued in 2017.
7 Under the statute, in order to amend an order,
8 we need to hold a hearing. That is the hearing
9 we're here for today.

10 Before we do anything else, I know
11 it's styled as a "public comment hearing", but
12 we're going to take appearances from the
13 parties who are here, since this is a hearing
14 in Docket 16-576. Starting over here.

15 MS. TEBBETTS: Good morning,
16 Commissioners. My name is Heather Tebbetts,
17 and I'm here to represent Liberty Utilities
18 (Granite State Electric). And with me today is
19 Anthony Strabone, Melissa Samenfeld, and David
20 Lepie.

21 MR. FOSSUM: And good morning,
22 Commissioners. Matthew Fossum, here for Public
23 Service Company of New Hampshire, doing
24 business as Eversource Energy.

1 MR. EPLER: Good morning,
2 Commissioners. Gary Epler, appearing on behalf
3 of Unitil Energy Systems. Thank you.

4 MS. HATFIELD: Good morning,
5 Commissioners. Meredith Hatfield, for
6 Conservation Law Foundation.

7 CHAIRMAN HONIGBERG: Welcome back,
8 Ms. Hatfield.

9 MR. BURKE: Good morning,
10 Commissioners. Raymond Burke, from New
11 Hampshire Legal Assistance.

12 MS. MINEAU: Madeleine Mineau,
13 representing Clean Energy New Hampshire,
14 formerly known as the "New Hampshire
15 Sustainable Energy Association".

16 MR. KREIS: Good morning, your Honor
17 and/or Chairman Honigberg. Good morning,
18 Commissioner Giaimo. I am D. Maurice Kreis,
19 sometimes called "Don Kreis". I'm the Consumer
20 Advocate.

21 And I'm happy to see Unitil on this
22 side of the aisle.

23 MR. WIESNER: Good morning,
24 Commissioners. Dave Wiesner, for Commission

1 Staff. With me are Karen Cramton, Director of
2 the Sustainable Energy Division; Tanya Wayland,
3 an Analyst with that Division; and Mary
4 Schwarzer, co-counsel.

5 CHAIRMAN HONIGBERG: I'll note for
6 the record that Commissioner Bailey is not here
7 this morning. She will be participating.
8 She's going to be reviewing the transcript and
9 any written submissions. I believe the
10 secretarial letter indicates that we'll take
11 written comments and filings in this matter
12 until September 3rd, 2019.

13 Again, since this is a hearing in the
14 docket, I'm going to look to the parties first,
15 if they want to comment. Maybe Staff should go
16 first to set the scene for those who are here.
17 But I'll be looking for the parties in the
18 docket first to provide their comments before
19 going to nonparties.

20 Mr. Wiesner, you want to start us
21 off?

22 MR. WIESNER: I think that would make
23 sense, Mr. Chairman. I'll just give hopefully
24 a brief overview of our recommendation and some

1 of the basis for it.

2 We have recommended that the
3 low/moderate income pilot program requirement
4 of the June 2017 order you referenced be
5 eliminated. That order contemplated that there
6 might be duplication and potential
7 inconsistency with legislative initiatives that
8 were specifically referenced, Senate Bill 129
9 of 2017, which was in process, but had not been
10 enacted at the time when the order was issued.

11 Since that time, further legislation
12 this year, Senate Bill 165 of 2019 has been
13 enacted, with what we understand was bipartisan
14 support, become effective July 1st, and is in
15 the process of being implemented. We have
16 proposed a conceptual framework for
17 implementation of that legislation through
18 rules. And we, in fact, will be discussing
19 that with stakeholders this afternoon in a
20 technical session.

21 There is, in our view, considerable
22 potential duplication, in particular, between
23 Senate Bill 165 and the low and moderate income
24 pilot programs as described at a high level in

1 the June 2017 order.

2 In particular, both would provide
3 on-mill -- excuse me, on-bill monetary credits
4 to low and moderate income customers; both
5 would require direct benefits to those
6 customers; both would provide an adder for LMI
7 customers above and beyond what the
8 compensation that would otherwise be payable
9 pursuant to net metering; and both require data
10 collection and reporting of costs and benefits,
11 which is one of the primary drivers for this
12 settlement proposal that was approved by the
13 Commission in June 2017 in this docket.

14 I'd like to take just a moment to run
15 through Senate Bill 129 implementation. We now
16 have two fiscal years' worth of experience with
17 that bill. That is the legislation that
18 required that 15 percent annually of the
19 Renewable Energy Fund be used to support low
20 and moderate income solar projects. The
21 Commission has implemented that through a
22 competitive solicitation process.

23 Over the past two fiscal years, that
24 program has awarded grant funding to six

1 projects, for a total of \$904,721. Three of
2 those projects are currently operational, and
3 others are under development or construction.
4 They range in size from 54 kilowatts to 100
5 kilowatts AC, for a total of approximately
6 420 kilowatts in total. And the projects are
7 expected to provide an average monthly benefit
8 of \$32 to more than 120 low and moderate income
9 households. In fact, approximately ten of
10 those households are considered moderate
11 income, rather than low income. The benefits
12 are provided in the form of either lot rent
13 reductions, which is the norm for manufactured
14 housing resident-owned cooperative projects, or
15 through on-bill credits, in particular, the
16 Solar Shares Program implemented in
17 collaboration with the New Hampshire Electric
18 Cooperative, or through the elimination of
19 electric bills for low-income housing
20 residents, as has been approved with the
21 Laconia Housing Authority.

22 The Program, the SB 129 Grant
23 Program, has not been fully subscribed. In
24 fact, \$150,000 of the 15 percent annual

1 set-aside was carried forward from last year
2 into this year. We believe that suggests that
3 there may not be enough low and moderate income
4 solar projects that are ready, even when grant
5 funding is offered.

6 Again, it's not yet clear how the
7 market will respond to the SB 165 incentives.
8 They only became effective on July 1st. We are
9 in the process of implementing them through a
10 rulemaking. But we do expect that there will
11 be a robust response from the market. And
12 again, we see that as potentially duplicative
13 of the model for the low and moderate income
14 pilot programs as contemplated in the June 2017
15 net metering order.

16 Finally, we were asked by Senator
17 Feltes, who cannot be here today, to read into
18 the record a statement. And I will do that
19 now. These are his words.

20 CHAIRMAN HONIGBERG: And just before
21 you do that, I want to make sure I understand
22 and the record is clear. You alluded to
23 implementing one of the statutes by a
24 rulemaking, and you also said that there was a

1 technical session this afternoon on rules. Are
2 we talking about the same thing there?

3 MR. WIESNER: Yes. That's correct.
4 These are the Puc 900 Net Metering rules. They
5 are due to expire very shortly.

6 We have proposed through an outline
7 that was circulated yesterday an approach for
8 implementation of SB 165. We'll be discussing
9 that in further detail with stakeholders this
10 afternoon, including, I would expect, many of
11 the folks who are in the room right now.

12 CHAIRMAN HONIGBERG: I suspect you're
13 right.

14 And now you have a statement from
15 Senator Feltes you want to read into the
16 record.

17 MR. WIESNER: Yes. These are his
18 words: "Senator Dan Feltes, who is unable to
19 be here today, and who is the prime sponsor of
20 Senate Bill 165, wishes us to convey to the
21 Commission that the elimination of current or
22 proposed pilots was not intended by SB 165."

23 And that's all I have, Mr. Chairman.

24 CHAIRMAN HONIGBERG: That's it?

1 MR. WIESNER: Yes.

2 CHAIRMAN HONIGBERG: All righty. We
3 do have some people who signed up and signed
4 in. I can take them in that order, if they're
5 all parties, or we can go in some other order.
6 But the people who look like they put in the
7 column that they wanted to speak were
8 Ms. Mineau, Ms. Hatfield, Mr. Kreis, Ms.
9 Tebbetts, and Mr. Fossum.

10 Is there anyone other than that who
11 knows they want to speak right now?

12 *[No indication given.]*

13 CHAIRMAN HONIGBERG: All right.
14 We'll take them in that order. Ms. Mineau, why
15 don't you start us off.

16 MS. MINEAU: Thank you, Commissioner.

17 Clean Energy New Hampshire opposes
18 removing the requirement for low/moderate
19 income net metering pilots from the order being
20 discussed today. We think that the proposed
21 pilot, especially the recent proposal brought
22 forward by Eversource, are not necessarily
23 duplicative of existing low/moderate income
24 programs under SB 129, or what would come

1 forward with the implementation of SB 165.

2 Specifically, we commend Eversource
3 for developing a pilot that includes a
4 collaborative effort between utility and solar
5 developers.

6 We think that their proposal would
7 leverage access of utility customer
8 information, specifically making available EAP
9 customers to participate in group net metering
10 as part of these projects, would be a really
11 great opportunity and something that should be
12 looked into. And that would not, I think,
13 necessarily occur if SB 165, you know, SB 165
14 wouldn't necessarily bring those opportunities.

15 The time line also would be very
16 uncertain. As Attorney Wiesner mentioned,
17 there has not been an overabundance of demand
18 for the low/moderate income community solar
19 grants. And so, it's uncertain how many or
20 when projects would come on line due to the
21 implementation of SB 165.

22 The order had made it clear that
23 there was data that would come out of the
24 pilots that would be used for future

1 development of net metering policies. And I
2 think that continuing forward with the required
3 pilots has a much higher likelihood of
4 generating that data in a timely fashion than
5 just hoping that projects will come on line
6 otherwise.

7 The Eversource proposal specifically
8 proposes 20 megawatts of low/moderate income
9 community solar to come on line in the next few
10 years.

11 I will remind the parties that we're
12 already past the recommended implementation
13 date, which was within 18 months of the order.
14 And so, I also fear that, if we remove this
15 requirement, we would send a message that, if
16 the utilities don't really want to do
17 something, if they drag their feet then they
18 won't have to do it.

19 CHAIRMAN HONIGBERG: Ms. Hatfield,
20 followed by Mr. Kreis.

21 MS. HATFIELD: Thank you, Mr.
22 Chairman.

23 Conservation Law Foundation agrees
24 with the comments of Clean Energy New

1 Hampshire. We also want to thank Staff for the
2 additional information provided this morning.
3 We did have a number of questions that we
4 shared with Staff about the number of customers
5 currently being served, and other information
6 that was helpful to hear.

7 We also do not support Staff's
8 proposal. We are very sympathetic to their
9 concerns about potential duplication. But our
10 feeling is that the parties can work with the
11 utilities and with Staff to try to prevent
12 that. And that perhaps the pilot that
13 Eversource has proposed could be part of
14 complying with Senate Bill 165.

15 So, we think that the parties, who
16 have a history of working together on these
17 issues, could ensure that there was not
18 duplication, so that we could serve as many low
19 and moderate income customers as possible.

20 Thank you.

21 CHAIRMAN HONIGBERG: Mr. Kreis, to be
22 followed by Ms. Tebbetts.

23 MR. KREIS: Thank you, Mr. Chairman.

24 The scheduling of today's hearing

1 prompted me to go back and review the bidding
2 when it comes to LMI solar projects, meaning
3 net-metered projects to benefit low and
4 moderate income customers. And I noted the
5 following:

6 The settlement agreement that my
7 office signed with the utilities in the net
8 metering docket way back when simply agreed
9 that there would be a task force that would
10 guide the creation, design and request for
11 Commission approval, in other words, subsequent
12 Commission approval of a bunch of different
13 pilot programs, one of which was an initiative
14 that uses monetary bill credits to make the
15 benefits of solar available to non-host low and
16 moderate income customers, whose circumstances
17 would otherwise not allow them to participate
18 in a net-metered project.

19 The Commission then went on in its
20 ultimate order on the merits in 16-576 a couple
21 of years ago to strengthen that commitment
22 somewhat, and said, and I think this is
23 probably consistent with the other settlement
24 agreement in the docket, that each utility

1 should develop a pilot program to include a
2 statistically significant number of program
3 participants, if possible, in order to ensure
4 data validity. And as Mr. Wiesner noted, there
5 was a reference to what was then pending,
6 Senate Bill 129, and a statement that the
7 Commission did not want "duplicative efforts".

8 I do think, as an aside, that Senate
9 Bill 129, Senate Bill 165 from this past
10 session, and what the Commission approved in
11 this docket, should all be regarded as
12 cumulative and requirements and policy
13 preferences that can and should be harmonized
14 with each other.

15 And so, then we move to the adoption
16 this summer -- or, this spring rather, of
17 Senate Bill 165, which states in relevant part
18 "the Commission shall authorize at least two
19 new low and moderate income community solar
20 projects each year in each utility service
21 territory starting in January of this year."

22 So, consistent with the statement
23 that Mr. Wiesner read from Senator Feltes, it's
24 clearly the public policy of this state at this

1 point that there should be significant efforts
2 to assist with the development of net metering
3 projects that benefit low and moderate income
4 customers.

5 Like Ms. Hatfield, I'm grateful for
6 the history that Mr. Wiesner rattled off,
7 because it does suggest that there has been
8 significant progress.

9 I think I'm inclined to favor an
10 outcome here that makes clear that, whether we
11 do it under the rubric of the order that's now
12 two years old, or whether we do it under the
13 rubric of Senate Bill 165, the Commission
14 expects that everybody in this room will
15 cooperate to assure that the benefits of net
16 metering are made meaningfully available to as
17 many low income customers as possible.

18 It's gratifying to note that, and I
19 don't mean to put words in the mouth of
20 Eversource, but my understanding is that the
21 position of Eversource is that it intends to
22 press forward with Commission approval for the
23 pilot program it has proposed in Docket DE
24 19-104. I don't think that we should encourage

1 Eversource to walk away from that interesting
2 initiative.

3 It's disappointing that the other two
4 investor-owned utilities haven't made similar
5 proposals. I think we should encourage them to
6 do so. But I don't -- I have no firm position
7 on whether it makes sense to eliminate the
8 requirement that you adopted in your order two
9 years ago, or whether we figure out some other
10 way to move forward. It's just important that
11 we move forward. I apologize for equivocating,
12 but I really favor what works.

13 CHAIRMAN HONIGBERG: All right.
14 Ms. Tebbetts, and then Mr. Fossum.

15 MS. TEBBETTS: Good morning again.
16 Granite State Electric is neutral to Staff's
17 memorandum to eliminate the requirement in
18 Docket DE 16-576 for low and moderate income
19 pilots.

20 We look forward to working with the
21 parties to find a marriage between the order
22 and what's in that order and the outcome of
23 Senate Bill 165.

24 Thank you.

1 CHAIRMAN HONIGBERG: Mr. Fossum.

2 MR. FOSSUM: Thank you. Good
3 morning. And thank you for taking our comments
4 this morning.

5 We recognize that the specific
6 purpose of this morning's hearing is discussing
7 the potential modification of the Commission's
8 order regarding the LMI pilots. But as the
9 Staff Recommendation notes, and as some of the
10 other parties have discussed, the
11 recommendation underlying this order, the order
12 scheduling today's hearing, was the Staff's
13 Recommendation that specifically Eversource's
14 proposed Clean Innovation Community Solar Pilot
15 be eliminated.

16 So, rather than more generally
17 discussing the underlying order from two years
18 ago, our comments this morning are going to
19 come from the perspective of the proposal that
20 we have made and its relation to the Staff's
21 Recommendation.

22 And as a couple of the parties have
23 noted already this morning, Eversource filed
24 it's Clean Innovation Community Solar Pilot

1 proposal over in Docket 19-104, following
2 participation in a fairly lengthy stakeholder
3 process, extensive and careful consideration of
4 the existing barriers of LMI project
5 participation in this and other jurisdictions,
6 and evaluation of this Company's -- our
7 Company's internal capabilities to support
8 these kinds of projects.

9 We continued to refine that proposal
10 nearly up until the time of filing, and there
11 may yet be cause to refine that proposal
12 depending on additional stakeholder input.

13 But based on the stakeholder feedback
14 we've received so far, and continued
15 developments in the solar market, including
16 passage of SB 165, or at least at the time of
17 our proposal the potential passage of SB 165,
18 we took care to propose a program consistent
19 with SB 165 were it to become law. And while
20 it was intended to be consistent, we're not at
21 this point convinced that it's actually
22 duplicative of what might be required under SB
23 165.

24 While it's true that projects that

1 might participate in our pilot would produce
2 on-bill credits for residential customers, and
3 likewise the case that projects that might
4 participate in our pilot would be eligible for
5 additional compensation above and beyond the
6 standard net metering credits for their
7 generation output for low and moderate income
8 projects.

9 But there are differences. As we've
10 explained in our filing, and based on our
11 review, bill credit mechanisms and additional
12 compensation on their own have not been
13 demonstrated to be consistently successful
14 tools for overcoming the barriers for LMI solar
15 participation.

16 Acquiring and managing customer
17 enrollment is a significant barrier for solar
18 projects to serve low-income customers.
19 Therefore, our proposal included a mechanism
20 for utilizing existing resources within the
21 Company's billing system, and the successful
22 New Hampshire Electric Assistance Program, to
23 enroll and ensure that the benefits of these
24 programs can be delivered to low and moderate

1 income customers. At least at this stage, we
2 do not see any similar mechanism to efficiently
3 enroll and managing customers being provided
4 for under SB 165.

5 The Eversource proposal also includes
6 participation on a pilot basis of projects up
7 to 5 megawatts in size. And we believe that
8 that is an appropriate opportunity to consider
9 potential advantages that this scale of solar
10 installation may be able to provide, in terms
11 of achieving economies of scale and greater
12 benefits for customers.

13 We acknowledge that in some of the
14 discussions we've had there is some measure of
15 disagreement on whether projects above the
16 current one megawatt threshold could be
17 included even on a pilot basis. But a pilot
18 basis does appear to be the only potential
19 forum at this time to test the benefits of
20 larger projects.

21 The Company is eager to explore
22 through its pilot an alternative model for
23 community solar that it believes has the
24 potential to maximize benefits for

1 stakeholders. We would be pleased to address
2 any specific concerns from the Staff and other
3 stakeholders, and the Commission, regarding
4 potential duplication of 165 in the course of
5 the review of our pilot proposal.

6 But, at this stage, we believe it's
7 in the best interest of customers, and in light
8 of the substantial work that's already been
9 undertaken, that our proposal move forward,
10 that it be reviewed, further refined, and
11 allowed to take place and test the benefits
12 that it might provide for New Hampshire
13 customers.

14 Thank you.

15 CHAIRMAN HONIGBERG: All right.
16 There's no one on the sign-up sheets who said
17 that they wanted to speak. Is there anyone
18 here who wishes to speak for the first time
19 now?

20 *[No indication given.]*

21 CHAIRMAN HONIGBERG: Is there anybody
22 who would like to respond to something someone
23 else said, and Mr. Wiesner and Staff, I'll
24 include you in that. Is there anything you've

1 heard that, you know, you want to respond to?
2 Anyone at all?

3 *[No indication given.]*

4 CHAIRMAN HONIGBERG: Do you want to
5 take a few minutes to think about it?

6 I see one finger went up in the air
7 telling me to wait.

8 *(Short pause.)*

9 MR. WIESNER: I'll just say quickly
10 that, just in response to Attorney Fossum's
11 comments, I don't think this is the forum where
12 a final decision would be made about the status
13 of Eversource's low and moderate income pilot
14 program proposal.

15 What we are talking about here is
16 whether there will be a requirement in the net
17 metering docket for the utilities, including
18 Eversource, to develop such pilots, bring them
19 forward for the Commission's review and
20 approval.

21 And if that requirement is
22 eliminated, that does not prejudice the final
23 disposition of Eversource's pilot. That's a
24 different docket, with a different schedule,

1 and it will go forward on its own merits.

2 CHAIRMAN HONIGBERG: Okay. Anyone
3 else want to say anything in response to
4 something someone else said?

5 *[No indication given.]*

6 CHAIRMAN HONIGBERG: I have a
7 question about 165, and who is the object of
8 that legislation? I know that Mr. Kreis read
9 some of the language, which obligates or seems
10 anyway to be directed at the Commission, in
11 "the Commission shall approve". Who's -- or
12 "authorized", I guess maybe is the word,
13 "authorized". Who's on the other end of that
14 authorization? Is it a utility? Is it a
15 developer? And are those people in any way,
16 shape or form obligated themselves to do
17 something? Or is this just a "we're going to
18 be waiting under 165"? And if people bring
19 projects forward, that's when the Commission
20 does something with them.

21 I'll give you the first crack, Mr.
22 Kreis, since you were helpful enough to
23 introduce the language in the hearing.

24 MR. KREIS: Thank you, Mr. Chairman.

1 I would say, I mean, the language
2 that I read before that you're alluding to is
3 somewhat ambiguous. But it does say -- it
4 refers to "each utility's service territory".
5 And my gloss on that somewhat ambiguous
6 language is that it seems to imply that the
7 utility should do something. Otherwise,
8 what -- like the idea that there should be "two
9 projects in the service territory of each
10 utility" wouldn't be terribly significant.

11 CHAIRMAN HONIGBERG: But we know that
12 developers need to connect, be connected to the
13 utilities' systems. So that may be -- that may
14 be good enough for them. Maybe they need to
15 drum up the business, but are they the ones who
16 have to sponsor it?

17 I mean, setting aside Mr. Fossum's
18 points about Eversource's project and
19 Mr. Wiesner's response to it. You know, we
20 don't have anything from Unitil and Liberty.
21 And I'm not sure that under 165 we have to.

22 MR. KREIS: I don't think that the
23 Commission has to do anything until somebody
24 comes to the Commission and says "Please

1 authorize our low and moderate income community
2 solar project."

3 But I think there's an implicit
4 expectation in the bill that the utilities will
5 be actively involved in pressing that forward
6 to the Commission for its approval. Although I
7 admit that the language is not as clear as it
8 might otherwise be.

9 CHAIRMAN HONIGBERG: Mr. Wiesner, you
10 wanted to say something. I'll get to you next,
11 Ms. Mineau.

12 MR. WIESNER: I think our view is
13 that SB 165 provides an incentive, both in
14 terms of a monetary adder and in that adder
15 being delivered through on-bill credits to
16 approved net-metering hosts and their groups.
17 And that what we really need to do is see the
18 market respond.

19 And so, I agree with the Consumer
20 Advocate that it is ambiguous what the minimum
21 of "two per utility service territory" is
22 entitled -- is meant to cover. It refers to
23 "authorize". But the Commission authorizes
24 something when a project is brought to it.

1 And I think our view is that group
2 hosts seek registration of low and moderate
3 income community solar projects, which would
4 entitle them to the three-cent, initially, and
5 then it goes down to two and a half cents after
6 a couple of years, adder for those projects
7 through on-bill monetary credits. And it's not
8 clear, in the absence of market response to
9 that incentive, what the utility's role would
10 be or what the Commission's role would be,
11 other than to review what is brought to it.

12 CHAIRMAN HONIGBERG: Ms. Mineau.

13 MS. MINEAU: That ambiguity in SB 165
14 is at the root of our concern that enough
15 low/moderate income community projects would be
16 developed in a timely manner to generate the
17 type of information that the required pilots
18 were seeking to generate.

19 I agree that it is very unclear that
20 there is a requirement for who the requirement
21 is aimed at, and that there is no consequence
22 stated in the policy. If no projects are
23 brought forward, the Commission only needs to
24 authorize what is brought forward. And if

1 nothing is proposed, then it seems like there's
2 no actual consequences.

3 CHAIRMAN HONIGBERG: Thank you. Any
4 other comments or statements people want to
5 make before we close this hearing?

6 *[No indication given.]*

7 CHAIRMAN HONIGBERG: All right. We
8 will then adjourn the hearing, understanding
9 that people can provide comments and
10 information in writing until September 3rd.

11 Anything else we need to do?

12 *[No indication given.]*

13 CHAIRMAN HONIGBERG: All right. We
14 are adjourned.

15 ***(Whereupon the hearing was***
16 ***adjourned at 10:37 a.m.)***

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