

water, and does not require eminent domain.

<http://www.l-a-k-e.org/blog/?p=9256> WWALS has argued those points directly with Southern Company <http://wwals.net/?p=35000> and Georgia Power and with NextEra for Florida, as well as with FERC, especially in the Sabal Trail pipeline FERC docket No. CP15-17.

- d. Many of the members of WWALS, especially in Georgia and Florida, either have rooftop or community solar power, or would benefit greatly from having it, through reduced electricity bills and through not being without power after hurricanes, when natural-gas-pipeline-derived electricity often fails for weeks. <http://wwals.net/?p=37159>
- e. The main impediments to wider and faster deployment of solar power is financing, and lack of will by electric providers. Solar reimbursement rates set by utilities in Georgia and Florida are already low, yet they are sufficient to make at least some rooftop and community solar deployment fiscally feasible. Putting FERC in charge risks those reimbursements going even lower, which would make solar deployment even more difficult. That would adversely affect many members of WWALS, who would find solar power more difficult to afford. And lower solar reimbursements would promote polluting pipeline and natural gas and coal power plants, adversely affecting everyone through increased pollution, including greenhouse gases speeding sea level rise and climate change.

3. Motion to Intervene.

For the reasons given above, WWALS has a substantial interest in this proceeding that cannot be adequately represented by any other party and may be directly affected by FERC decisions herein. WWALS is an interested party within the meaning of 18 CFR §385.214(b)(iii), and its participation in this proceeding is in the public interest.

4. Motion to Deny.

In addition to all the reasons stated in 2 above, WWALS notes that as far back as 2013, Austin Energy commissioned a study that showed that local solar generation is actually a net benefit to electric utilities, because of elimination of line losses, less wear on lines, and deferred or delayed construction of fossil fuel power plants.¹ Austin Energy consequently raised its solar reimbursements higher than its domestic electric rates. The Public Utilities Commission of Minnesota also approved such a value of solar tariff (VOST).² Without flexibility for states and local utilities to set solar reimbursement rates, neither of those VOST implementations would have been possible, to the detriment of local solar generators everywhere.

¹ [The Revolution Will Be Solarized](https://www.oxfordamerican.org/magazine/item/219-the-revolution-will-be-solarized/), Chris Warren, Oxford American, 7 June 2013, <https://www.oxfordamerican.org/magazine/item/219-the-revolution-will-be-solarized/>

² A Rising Tension: 'Value-of-Solar' Tariff Versus Net Metering: TASC members SolarCity, Sungevity, Sunrun and Verengo are battling to keep net energy metering intact. Herman K. Trabish, gtm, 10 April 2014, <https://www.greentechmedia.com/articles/read/A-Rising-Tension-Within-the-Solar-Industry-Value-of-Solar-Versus-NEM>