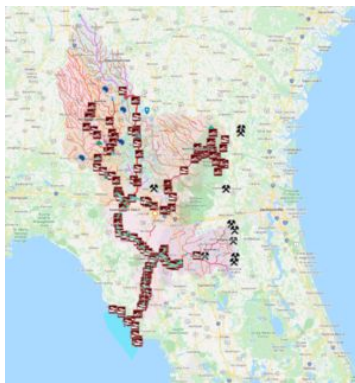


June 15, 2020

To: Federal Energy Regulatory Commission (FERC)
Via e-filing

Re: **Motion to Intervene and Comment of Opposition by WWALS Watershed Coalition, Inc. on Petition for Declaratory Order of New England Ratepayers Association under EL20-42**

Dear Secretary Davis and FERC Commissioners,



Pursuant to the Commission's Rules of Practice and Procedure (18 CFR §385.214 and §385.214), WWALS Watershed Coalition, Inc. (WWALS) as Intervenor hereby moves to intervene as a party to this proceeding, namely **Petition for Declaratory Order of New England Ratepayers Association under EL20-42**, as published in the Federal Register April 22, 2020. In support hereof, Intervenor shows as follows:

1. Contact Information and Service of Filings

Intervenor requests that the Commission include the following representatives on the official service list to receive service of all filings and communications made in this proceeding:

John S. Quarterman, Suwannee Riverkeeper,
WWALS Watershed Coalition, Inc., wwalswatershed@gmail.com

2. Basis for Intervening:

- a. WWALS Watershed Coalition, Inc. (WWALS), established 2012, is a nonprofit environmental advocacy organization, with active members and supporters in Georgia and Florida. WWALS remains deeply concerned about the destructive activities of pipeline companies such as Sabal Trail as they affect rivers and the Floridan Aquifer in south Georgia and north Florida. WWALS advocates solar power instead, consonant with the WWALS Mission, which is that WWALS advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.
- b. Since 2013, WWALS has actively requested the Georgia Public Service Commission (GA-PSC) to require Georgia Power to buy more solar power, in letters <http://wwals.net/?p=679>, <http://wwals.net/?p=49473>, <http://wwals.net/?p=50610> and in-person testimony. <http://www.l-a-k-e.org/blog/?p=4241> Along with such requests by many other organizations and individuals, GA-PSC has at least twice required Georgia Power to buy more solar power. <http://wwals.net/?p=49713>
- c. WWALS has long argued and demonstrated using pipeline industry figures that solar power is faster to install, and less expensive than natural gas pipelines, plus it uses no cooling water, emits no pollutants to air or

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www.wwals.net
WWALS is an IRS 501(c)(3)
nonprofit charity est. June 2012
*WWALS Watershed Coalition
advocates for conservation and
stewardship of the Withlacoochee,
Willacoochee, Alapaha, Little, Santa
Fe, and Suwannee River watersheds
in south Georgia and north Florida
through education, awareness,
environmental monitoring, and
citizen activities.*



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>

WHEREFORE, for the above reasons, Intervenor requests that the Commission GRANT its Motion to Intervene.

FURTHER, for the above reasons, Intervenor moves for the Commission to DENY the **Petition for Declaratory Order of New England Ratepayers Association under EL20-42.**

Done this 15th day of June, 2020.

For the rivers and the aquifer,

John S. Quarterman

/s

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