

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

Docket No. 2021-AD-19

IN RE: ORDER ESTABLISHING DOCKET TO REVIEW THE EFFICACY AND FAIRNESS
OF THE NET METERING AND INTERCONNECTION RULES

**COMMENTS OF THE MISSISSIPPI NAACP STATE CONFERENCE ON
COMMISSION'S ORDER SEEKING COMMENT**

COMES NOW the Mississippi NAACP State Conference (NAACP) and pursuant to the Mississippi Public Service Commission's ("Commission") Order Seeking Comment dated February 2, 2021, files these comments.

NAACP appreciates the opportunity to comment on the efficacy, fairness, and functionality of the Mississippi Renewable Energy Net Metering Rule ("Net Metering Rule") and the Mississippi Distributed Generator Interconnection Rule ("Interconnection Rule").

The Mississippi NAACP State Conference is a strong, active and influential affiliate of the 112-year-old NAACP international headquarters in Baltimore, Maryland. Its **Environmental and Climate Justice Program** works at addressing the many practices that are harming communities nationwide and worldwide and the strong and inclusive policies needed to rectify these impacts and advance a society that fosters sustainable, cooperative, regenerative communities that uphold all rights for all people in harmony with the earth.

NAACP's RESPONSES TO COMMISSION QUESTIONS

NAACP's comments are organized to respond, as applicable, to the 18 questions included in the Commission's February 2, 2021 Order Seeking Comment. NAACP's responses concentrate on

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the questions on which it has primary interest and expertise. The source for the content contained in the answers can be found at the [NAACP \(National\) Environmental and Climate Justice Committee Website](#).

1. Have the Net Metering and Interconnection Rules been effective in creating meaningful access to renewable self-supply opportunities for Mississippi electric customers?

No. As of October 2016, Mississippi had no uniform or statewide mandatory net metering rules. According to 2016 report by the American Council for an Energy Efficient Economy (ACEEE), Mississippi was rated #46, out of 50 states and the District of Columbia, in overall energy efficiency. As of 2016, there were no states with Minority Business Enterprise provisions specific to energy.

2. What, if any, modifications to the Net Metering and Interconnection Rules could meaningfully increase customer access to renewable self-supply

As the energy efficiency and clean energy transition advances, we must be careful not to put ‘old wine in new wine skins’ by repeating the patterns of environmental and economic injustice that has brought us to where we are now. We must ensure that new models of reducing our energy usage and building new energy systems based on clean energy are centered in priorities and practices that prioritize community ownership and control, local economic development, workers’ rights, affordability, and access. For example, unfortunately, the impressive expansion of solar power in the U.S. has been concentrated among middle- and upper-income households; the new rules must be accessible to LMI households.

3. What, if any, modifications to the Net Metering and Interconnection Rules would incentivize increased participation by both net metering customers and industry providers

such as developers, designers, installers and maintenance providers for distributed generation facilities?

The NAACP recommends that state net metering policies have a capacity limit that is not less than 2,000 kW. This means that if a customer's renewable energy system does not have a capacity above 2,000 kW, the utility is required to credit the customer for any net electricity that the customer generates and contributes back to the grid. To incentivize clean energy practices at the consumer level, we need to offer the opportunity for revenue-generation for individuals and small businesses that contribute to the grid through their energy production.

4. What, if any, modifications to the Net Metering and Interconnection Rules should the Commission consider to increase low-income access to, and participation in, net metering?

Low-income households in the United States spend a higher percentage of household income on energy costs. Their energy spending is more than twice the average for non-low-income households—8.3 percent compared to 2.9 percent—and four times the median national household energy burden— a median of 13.3 percent compared to 3.3 percent. Access to renewable energy generation, through distributed generation, can significantly reduce the energy burden of low-income households by providing electricity below local utility rates. Household energy burden is the percentage of annual household income that is used to pay annual residential energy bills. The lower rates and energy savings that can be realized by community owned renewable energy generation are key foundations of the just energy transition.

5. What, if any, modifications to the Net Metering and Interconnection Rules should the Commission consider to better enable commercial and industrial enterprises to self-supply?

Energy efficiency and clean renewable energy benefits are both macro and micro -- they bolster and sustain our domestic economy, as well as strengthen local communities, households and

businesses. Energy efficiency produces a host of economic benefits, including household and consumer savings, worker productivity, and more. Better building materials associated with energy efficiency generate health benefits by improving indoor air quality and creating safeguards for people who are most susceptible to respiratory illnesses. Clean renewable energy benefits similarly increase community savings in the long-term and they offer a tremendous opportunity to develop assets within communities that can be leveraged for more economic and social benefits.

10. What role, if any, should the Mississippi Public Utilities Staff serve in reviewing facilities studies for Level 2 and/or 3 interconnections?

The role of the NAACP leadership in engaging with and influencing the PUCs/PSCs in each state is a critical aspect of upholding civil and human rights as it relates to advocating for justice in regulating our nation's energy infrastructure.

In Mississippi, which is 38% African American, there has never been an A.A. Commissioner in the 80+ year history of the PUC. In Georgia, there has only been one A.A. commissioner in the 107-year history. This is significant, given the disproportionate location of energy production facilities in low income, communities of color, and the utility rates that they regulate have a disparate impact on women, communities of color and low-income communities.

11. In light of the Commission's recent approval of advanced metering infrastructure (AMI) for Entergy and Mississippi Power Company, are bi-directional meters still needed for effective net metering?

Yes

17. What role, if any, should the Commission's Joint Solar Safety and Net Metering Working Group Continuing forward?

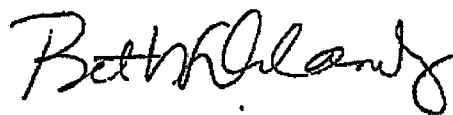
If electric utilities fulfill 20% of their electric sales through renewable energy, 1.9 million jobs can be created across the United States. By 2030, an estimated 20% of U.S. electricity will be provided by wind power. The solar power industry is projected to be a \$15 billion industry.

18. What measures and mechanisms should the Commission consider to better enable schools, state and local government bodies, and other non-profit or tax-exempt entities to participate in net metering?

The extension of effective disadvantaged business enterprise models to states' energy industries in particular with set-asides ensuring a minimal percentage of procurements go to disadvantaged businesses; with regular, catalytic formal training programs; and with notification systems that guarantee that no opportunity gets missed, would have significant, positive impacts on economic justice, and on environment and climate justice in tandem. Currently no state has an MBE provision in place that is specific to energy policies.

This, the 5th day of April, 2021.

Respectfully submitted,
Mississippi NAAP State Conference



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CERTIFICATE OF SERVICE

I, Beth L. Orlansky, counsel for Mississippi NAACP State Conference do hereby certify that in compliance with RP6.122(2) of the Commission's Public Utilities Rules of Practice and Procedure (the "Rules"):

(1) An electronic copy of the filing has been filed with the Commission via e-mail to the following address: efile.psc@psc.state.ms.us

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This the 5th day of April, 2021.



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