

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

FILED
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MISS. 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 EECHO AND STEPS
ON THE COMMISSION'S ORDER SEEKING COMMENT

COME NOW Education, Economics, Environmental Climate and Health Organization, Inc. ("EECHO") and the Steps Coalition ("Steps"), and, pursuant to the Mississippi Public Service Commission's ("Commission") Order Seeking Comment dated February 2, 2021, file these comments.

EECHO and Steps,¹ who both focus on the underserved and vulnerable populations in Mississippi, appreciate 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").

¹ EECHO and Steps are unrelated Mississippi non-profit corporations based in Gulfport, Mississippi. EECHO works with communities to address the health, environmental and economic challenges that disproportionately impact our most vulnerable communities. EECHO and its members recognize fair and equitable treatment of distributed generation as critical to addressing the climate crisis and energy poverty.

Steps is made up of over 30 community organizations that represent citizens in Mississippi's coastal counties. Steps also has individual members in these counties. Steps and its members help underserved communities identify priorities, develop leadership and strategies, and take action for community change. Some of Steps' primary program areas are sustainable resource development, economic development and environmental stewardship. Distributed generation policy is critical to each of these areas.

INTRODUCTION

EEECHO and Steps believe it is clear that, while the current Net Metering Rule and Interconnection Rule can provide a foundation on which to build, there are major shortcomings that have held back the adoption of distributed generation (“DG”) technologies in Mississippi while it has proliferated in many other states across the country. This is especially true of the lack of availability of DG to, and adoption of DG by, low to moderate income people (LMI) in Mississippi. Given the slow adoption of DG in Mississippi to date—we have among the lowest adoption rates of all of the 50 states—, it is clear from experience that the current Net Metering and Interconnection Rules are insufficient for growing DG adoption.

That the residents of Mississippi are currently missing this opportunity is especially unfortunate when compared to the potential in this sunny state for creating not only the energy that DG can produce, but also the energy savings, jobs and other economic benefits that a robust DG market can produce.

COMMENTS

EEECHO and Steps specifically adopt, join in, and incorporate:

(1) the Comments of (a) the Sierra Club and (b) PosiGen, Inc. and

(2) the revised redlined Net Metering and Interconnection Rules attached to Sierra Club’s comments.

April 5, 2021.

Respectfully submitted,

Education, Economics, Environmental Climate and
Health Organization, Inc. and
The Steps Coalition

By:

/s/ David W. Clark

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CERTIFICATE OF SERVICE

I, David W. Clark, counsel of record for the Education, Economics, Environmental Climate and Health Organization, Inc., 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

(2) An electronic copy of the filing has been served via e-mail to the following addresses:

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This, the 5th day of April, 2021.

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