

To Whom It May Concern:

The recent petition (Docket No. EL20-42-000) with the Federal Energy Regulatory Commission (FERC) by the New England Ratepayers Association (NERA) to place net metering under federal jurisdiction represents an anti-competitive effort to usurp the power of state regulators and cede more power to the federal government. Additionally, this petition, if granted, would cause an undue increase in electric costs to approximately 2.2 million homes and 100,000 other customers across this United States. An unexpected, unwarranted increase in costs during uncertain times caused by a global pandemic will further burden American families who are trying their best to make ends meet.

As the Executive Director of the Ohio Conservative Energy Forum, a conservative organization that recognizes clean energy as a way to advance our nation's energy dominance while providing power to build and sustain the American way of life, I am convinced this petition would severely limit the freedom of Americans who wish to invest in solar power. Federalism is one of the guiding principles of the United States, and the ability of the states to regulate internal policy and commerce has long been a hallmark of the Republic. This petition would be a direct attack on twenty years of precedent that the states, and their elected officials, have the power to regulate their respective energy policies.

Presently, nearly 7,000 Ohioans who participate in net metering would be directly and adversely affected should this petition be granted. The full impact of the consequences may not be immediately known as state legislatures and utility commissions would lose policy flexibility to design retail distributed generation and distributed energy resource programs, potentially hampering ongoing utility grid modernization efforts and many other programs administered by the states.

Therefore, I am respectfully asking that FERC refuse to grant this petition and instead choose to recognize the role of individual states in setting just and reasonable rates for their citizens.

Respectfully submitted,

Tyler M. Duvelius Executive Director

Ohio Conservative Energy Forum