

BILL046(22)
Testimony

MISC. COMM. 378

COUNCIL

COUNCIL Meeting

Meeting Date: Sep 7, 2022 @ 10:00 AM

Support: 0

Oppose: 0

I wish to comment: 1

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Representing: Hawaii Solar Energy Association (HSEA)	Position: I wish to comment	Submitted: Sep 6, 2022 @ 09:39 AM



Hawaii Solar Energy Association
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Testimony Supporting Intent of Bill 46 (2022) CD1 Relating to Height Limits for Rooftop Structures

Wednesday, September 7, 2022

Dear Chair Waters and Councilmembers:

HSEA **supports the intent** of Bill 46 (2022) CD1 Relating to Height Limits for Rooftop Structures but **offers a suggested amendment below to remove a critical issue with the bill.**

HSEA includes the majority of locally owned and operated solar and renewable energy companies in the State of Hawaii, employing thousands of residents in well-paying jobs including, but not limited to, contractors, designers, electricians, engineers, financiers, installers, salespeople, and service technicians.

Rooftop solar and energy storage have been and continue to be one of the most effective and powerful tools to lower customer energy costs, replace inflexible and dirty fossil fuel generation such as the AES coal plant, and decarbonize Oahu's economy. Since 1977, HSEA's member companies have led investment in Hawaii's renewable energy transition installing over 94,000 residential and commercial solar systems representing over a gigawatt of renewable production capacity. Rooftop solar systems are overwhelmingly the largest contributor to Hawaii's renewable energy portfolio at 44.7%. In the City and County of Honolulu alone, we've installed over 64,000 systems representing 774 megawatts of capacity.¹ These systems have not only produced clean and cost-effective energy for our island, but they have acted as a buffer against high and volatile global energy prices. Increasingly, existing and newly installed systems will provide critical grid services to allow for the cost-effective attainment of the City and State's critical 100% renewable energy mandate and other resilience goals. The pioneering Battery Bonus Program, which provides incentives for customers to add battery storage as a reliable

¹ See HECO PV and renewable energy statistics here

(https://www.hawaiianelectric.com/documents/clean_energy_hawaii/clean_energy_facts/pv_summary_2Q_2022.pdf) and here (<https://www.hawaiianelectric.com/clean-energy-hawaii/our-clean-energy-portfolio>)



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system resource, is only the beginning of what is yet to come.² Going forward with the right set of policies, solar and storage installations will become increasingly accessible for lower income customer segments, create jobs, drive our clean energy transition, and become a foundation for strong and healthy economic growth.

Bill 46 will help us achieve these goals by clarifying rules and setting common-sense height exemptions for solar canopies in the crucial multi-family, commercial, and mixed-use sectors. While we appreciate that the bill expands its reach to both existing and new structures, we have concerns that the lower ten (10) foot limit may be overly restrictive and lead to suboptimal outcomes. To maximize solar production capacity, system designers need flexibility to orient solar panels in the optimal position and angle on a roof. A maximum height of 10 ft may not allow system designers to install solar canopies at Hawaii's optimum solar orientation angle and simultaneously allow for usable space underneath. This will limit the overall attractiveness and benefit to the buildings' residents. In addition, elevator rooms at a higher 18 feet will create shading issues that lower the productive capacity of the systems. **For these reasons, we suggest increasing the height limitation for solar canopies to 18 feet in alignment with the elevator room limit.** This will give system designers the flexibility to optimize output and function to account for panel shading and orientation and provide maximum energy production capacity given limited space. It will also allow more potential uses under the canopy itself.

Thank you for giving us the opportunity to testify in support of the intent of Bill 46 (2022) CD1.

Sincerely,

/s/

Rocky Mould

Executive Director

² See HECO Battery Bonus Program details here (<https://www.hawaiianelectric.com/products-and-services/customer-renewable-programs/rooftop-solar/battery-bonus>)