



TWO TO TAN

WHAT'S GOOD FOR WASHINGTON'S SOLAR MANUFACTURERS
IS NOT ALWAYS BEST FOR SOLAR IN WASHINGTON



Solar module sales have become a commodity game. The lowest price wins, except in Washington State. Here, cheap modules from China sit on the shelf while expensive Washington-made modules go on the roof. This is the result of an incentive designed to prop up small, home-state manufacturing. The subsidy has assured the survival of local producers in a risky business environment. But it comes at a cost for PV system integrators and system owners, increasing the risk of an otherwise stable solar investment.

GO

PHOTO
TRAVEL

Solar seawall: When water levels rise, this Vashon Island installation takes on the salty swells of the Pacific Ocean.

The folks at Silicon Energy LLC leave no doubt about the durability of their Cascade Series solar module. In a showroom at the company's assembly plant in Marysville, Washington, you can inspect miniature modules that were subjected to gun shots

at shooting range to test the tempered glass on both sides of the cells. Or you can hop up and down trampoline-style on a full-size module resting on wooden planks just off the floor. It doesn't break.

Until recently, Silicon Energy supplied the only solar modules made in Washing-

ton State. As such, these super-strength modules were the only ones that qualified for a lucrative photovoltaic (PV) installation incentive designed to support in-state manufacturers. Users of the panels might have had no need for modules that can stop a speeding bullet, but the incen-



tive made these high-priced panels competitive and helped Silicon Energy gain a share of Washington's solar market.

Only it didn't greatly accelerate the growth of the market. In 2 years, Silicon



Energy, the state's biggest player, has added about 2 MW of PV capacity to the grid.

In September, Washington made the home-state incentive available to a second modulemaker, ItekEnergy, Inc., an upstart out of Bellingham that has equipment to produce 5 times as much as its established rival. Itek introduced a healthy measure of competition. But both producers would have to cut their prices in half to compete even with other US-made modules, much less the far cheaper imports from Asia. In early November, Itek was selling for over \$3 per W. Silicon Energy had fallen just below \$4 per W.

The PV market here is small by any measure. System integrators keep busy

Aye, aye, captain: Tangerine Power CEO Stanley Florek works out of a repurposed tugboat overlooking Lake Union in Seattle. His job is to tow rafts of financing into Washington's PV market.

seeking out residential customers who can absorb the high upfront cost of a PV system with Washington-made modules. Installation activity is clustered within the Puget Sound region of western Washington, from Bellingham near the Canadian border down to the state capitol, Olympia. In spite of the available incentives, the industry has barely penetrated the vast territory east of the Cascade mountain range where irradiance levels, as a rule, are 20 percent higher. It hasn't opened a pipeline for commercial or utility-scale projects either.

The state incentive is due to expire in 8 years and it might drop in value or run out of funding well before then. This level of uncertainty and the lack of support for commercial and utility-scale projects have effectively kept large manufacturers from setting up shop in Washington, preserving a market for small companies



Jonathan William Heide / photon-pictures.com (2)

New kids on the roof: A&R Solar ordered about 40 kW of Washington-made Itek Energy modules as soon as they hit the market this fall. For this project, A&R sets down 6.5 kW on a single-family home in Tenino.

like Silicon Energy and Itek. But there's little stopping the state's module makers from taking business elsewhere if the incentive at home disappears. Their survival might depend on it. Under the existing subsidy scheme, even if the solar market grows quickly in the coming years, the growth rate would be hard to sustain and the market would be liable to collapse.

Sky-high incentive

Sustainability, it turns out, is in the eye of the beholder. Mike Nelson, who led the effort to create Washington's PV installation incentive in 2005, says the policy was designed to shield local compa-

nies from market volatility. Cheap solar cells and modules have made PV systems more attractive, but relentless downward pressure on prices is threatening the large manufacturers who brought these products to market. »A race to the bottom like we're seeing right now is probably not sustainable growth, « Nelson says. »I think we'll see a lot of companies going bankrupt and a lot of buyouts.«

The 2 module manufacturers in Washington shouldn't worry about bankruptcy because the state provides their customers with a performance-based incentive that in most cases pays 54¢ per kWh and sometimes pays \$1.08 per kWh.

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Hot off the press: Silicon Energy's Cascade Series module was developed when the company was owned by Outback Power Technologies. Wires are fully enclosed in a proprietary aluminum mounting system.

Jonathan William Held / photon-pictures.com

PV system owners in Washington who buy out-of-state modules and inverters get 15¢ per kWh.

If Washington structured its subsidy like a German-style feed-in tariff, with a price of electricity that's guaranteed for 20 years, the sky-high incentive levels would set the market on fire. Germany recently applied a 15 percent cut in tariff rates for PV systems commissioned in January 2012 or later. The new rates range from 17.9 euro cents (25.1¢) to 24.4 euro cents (34.1¢), depending on the PV system size and location.

Washington has added 3.4 MW of solar capacity for the year. Germany, with lower tariff rates, has grown 1 thousand times faster. The reasons are clear. Instead of guaranteeing payments for 20 years, Washington designed its incentive to decline and then expire on June 30, 2020. This means each day when the sun goes down, investors waiting to purchase a PV system watch the value of the incentive fall.

PV-system owners are also limited to a maximum incentive payment of \$5,000 per year. Businesses are eligible

for the incentive, but this small financial reward doesn't always justify the amount of work needed to manage the project. »When you go to a CFO and you're talking about \$5,000 a year, they're not going to go for it. It's not worth their time,« says Gary Shaver, the CEO of Silicon Energy.

There's one more limit that will eventually bring Washington's entire PV program to a halt unless there's a change in the subsidy scheme: incentive payments are distributed separately by electric utilities that participate in the program. About half of the state's 62 utilities have joined in. But the incentive payments cannot exceed a half-percent of each utility's power sales, or \$100,000, whichever is larger.

Once a utility reaches its limit on PV incentive payments, it can stop accepting new incentive requests or keep processing requests and reduce the price of electricity paid to all PV investors. »That's one of things we lobbied against last year. Because of the way the incentive is written, you can't get investors excited in Washington State,« Shaver says.

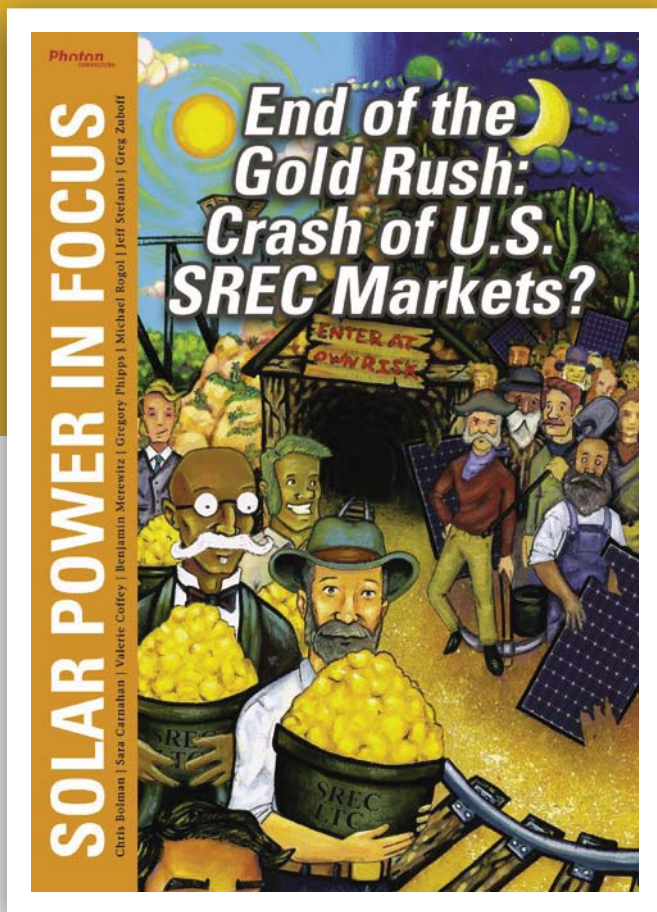
»Why in their right mind would they accept that kind of risk?«

Home-state inverters

Washington has been an historical hub of US inverter production. Trace Engineering was operating in the state 20 years ago. Xantrex Technology acquired Trace and continued manufacturing in the same location, though it is now a subsidiary of Schneider Electric and has ceased manufacturing in Washington. But Outback Power Technologies, Inc., a supplier of off-grid inverters and grid-tied inverters with battery backup, began manufacturing in Washington decade ago.

The installation incentive in the state depends on the availability of a Washington-made inverter. Without it, a PV system owner can't qualify for the 54¢ subsidy and the payment is reduced to 36¢. This presented a problem for Silicon Energy, once it was ready to take the Cascade module to market. Outback had not gotten its inverters certified for the installation incentive and no other company had stepped into the breach.

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Report Highlights

- **Exponential growth in solar-power installation** will soon surpass the volume of SRECs that utilities in key states are required to purchase, causing a crash in the solar market in certain states.
- *End of the Gold Rush* provides a **profile of the key U.S. SREC markets**—New Jersey, Pennsylvania, Maryland, Ohio and Massachusetts—through 2014.
- The report provides implications for financiers, integrators, manufacturers, installers, electricity companies and policy makers, and **recommends actionable measures to lock in value now and mitigate future risk in these markets.**



For more information, please scan this QR code with your smartphone, e-mail info@photonconsulting.com or call us at (+1) 617.262.5701.



Wish you were here: A serene morning for sailing on Lake Washington with a view from Seattle's Laurelhurst neighborhood.

Silicon Energy improvised a solution. It purchased residential inverters from Power One, Inc.'s Aurora Uno product line and packaged them with a utility meter socket and AC and DC disconnect switches. The inverters were not made in Washington, but they were assembled with the other components in state. Technically, is this so different from buying out-of-state solar cells and assembling them in Washington with glass, a backsheet and a frame? It depends who you ask. The Washington State Department of Revenue recognized Silicon Energy's »solar inverter system« as a Washington-made product. Then someone reportedly lodged a complaint.

Shaver says the product is still officially certified, but he has moved ahead and licensed a different set of string inverters. The specifications published by Silicon Energy match the product specs from Motech Industries, Inc.'s PVMate inverter line. Asked if Motech was the license holder, Shaver would not confirm or deny it. He bristles over the entire episode, which led Silicon Energy to give up Power One's transformer-less inverter and deviate from its core business of module assembly. »Our original goal was not to become an inverter manufacturer. That was the last thing we were interested in,« he says.



Don't try this at home: Silicon Energy salesman Mike Farrell shows off the Cascade module's bulletproof glass.

Itek has also had to navigate the tricky business of finding an eligible Washington-made inverter to pair with its modules. Just like Silicon Energy, it struck a licensing deal to do contract manufacturing. Itek's first agreement is with Exeltech, a string inverter manufacturer from Texas. Itek president John Flanagan has also met with microinverter manufacturers about licensing their technology and producing it locally in Washington.

The Exeltech inverter's performance characteristics place restrictions on PV system design. The system is limited to no more than 10 Itek modules on a string because the energy harvest from a larger string would exceed the 1800 W inverter's maximum output. The system is also limited to no fewer than 9 Itek modules per string because when the temperature is high the array voltage from a smaller string would be too low to keep the inverter running.



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Fruits of labor: Mike Nelson says the Washington renewable energy incentive has generated \$68 million of economic activity to date at a cost to the state of \$1.5 million. »Show me how many government programs have done that,« he says.

Jonathan William Held / photon-pictures.com (2)

This means if you have a roof space that fits 17 modules, you can install only 10 of them.

Despite these technical constraints, Itek's arrival has stirred excitement among companies that want to sell the new Washington-made module. A month after starting commercial production, Flanagan says he signed up almost 100 dealers. But he plans to ramp up production slowly as his technicians



Price warrior: Itek Energy president John Flanagan says his monocrystalline module »can be competitive with any US manufacturer.«

get accustomed to the assembly line. During a factory tour in early November, line workers were trying to tame a suction arm on the automated stringer machine. The arm is supposed to lift 1 solar cell at a time from a tray for inspection and soldering. The suction was pulling too hard. Some cells were coming out 2 at a time.

Both Washington module manufacturers have cautious outlooks for market growth next year. Silicon Energy, which has run its 6 MW production line at about half capacity this year, may increase output in Washington by 25 to 50 percent next year, Shaver says. He expects a similar level of production from a new factory Silicon Energy opened this year in Minnesota.

Itek expects to run its 30 MW production line a little less than half time next year, enough to produce about 12 MW in total. »We would like to do 8 MW in Washington,« Flanagan says. The rest

would go to nearby states like Oregon, Idaho and Montana.

Neither projection is all that aggressive. But if both are achieved, Washington would have a banner year with over 10 MW of new capacity, plus any additional capacity from PV systems using out-of-state modules.

Slow growth

PV system integrators, like the suppliers of their Washington-made modules, voice a cautious optimism about the local installation market next year. A measure of consistency would be a nice start. In past years, changes in legislation and spells of weak demand have stalled sales for months. Howard Lamb, the founder of Seattle-based Sunergy Systems LLC, says in 2012, »We'd like to have 3 full crews and the third crew staying busy all year round.« Lamb performs a quick calculation for how this would affect Sunergy's installed capacity. He expects to finish 2011 with around 500 kW installed. Next year's goal is about 750 kW.

No other system integrator in Washington is doing much more than Sunergy

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and not many expect to install as much capacity next year. Seattle-based integrator, A&R Solar Corp., is also looking for consistency. Company director Dave Kozin says A&R has added about 200 kW

this year while averaging 2 PV projects per month. With a full-time salesperson on staff for the first time, Kozin hopes volume will increase next year to 3 systems per month. Another integrator in Seattle, Puget Sound Solar LLC, might reach 400 kW next year, says co-owner Jeremy Smithson, »if we keep steaming along the way we are now.«

These projections from 3 of the top-selling integrators in Washington add up to about 1.5 MW of new capacity next year. If the state is heading for a banner year in 2012 as its newest module maker predicts, who will see that all these PV systems get built?

Standing by Silicon: Puget Sound Solar co-owner Jeremy Smithson is one of Silicon Energy's top dealers. Puget Sound Solar won a competitive bid to supply the Solarize Magnolia campaign with Silicon Energy systems.



Project developers are starting to fill an important role in Washington. Two years ago when the state set up an incentive for community solar projects – installations up to 75 kW owned by individual investors, business entities or utility ratepayers – there was a great deal of interest, but it wasn't immediately clear how people would most readily get these projects started.

One group of neighbors on Whidbey Island off the coast of Washington formed a private company, Island Community Solar, LLC, then wrote a business plan and pooled enough money for a 25 kW solar project. The group financed part of the deal by negotiating a 10-year power purchase (PPA) agreement with Washington's biggest power company, Puget Sound Energy. The PPA provides revenue in addition to the state incentive for community



Jonathan William Heide / photon-pictures.com (2)

All for sun: Northwest Seed executive director Jennifer Grove, project manager Linda Irvine and project coordinator Alexandra Sawyer (left to right) visit a PV system installed as part of a bulk-purchase in Seattle's Magnolia neighborhood.

solar projects, which pays \$1.08 per kWh.

Not many other groups have followed the Whidbey Island neighbors, in spite of the eye-popping incentives. Linda Irvine, one of the Whidbey neighbors who created Island Community Solar, can understand why. »I think the law was a bit naïve,« she says. »If we create this incentive, people will do it.« The fact is you need to be a solar developer to figure out how to do solar as a business, or you need to be a utility«.

Stanley Florek, the CEO of Seattle-based Tangerine Power, is one developer who's trying to make it easier for

small investors to buy shares in Washington community solar projects. The Whidbey Island neighbors found enough investors in the community for their PV project. But they wouldn't have been able to publicly advertise an investment opportunity to raise more money without getting in trouble with securities regulators. »The rules make no distinction between 10 citizens getting together to put up solar, barn raising-style, and a hedge fund,« Florek says.

A developer like Tangerine saves investors the trouble of forming a business entity to participate in community solar. The developer also takes

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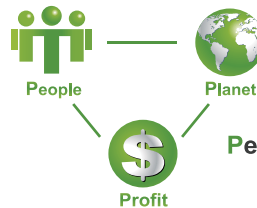
Top Competitive Cost Structure
Vertically-integrated manufacturing
Economies of scale: 1.5 GW in 2011

Trustworthy Customer Service
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Growing service coverage and quick response system

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Solar farm: Sunergy Systems founder Howard Lamb visits 21 Acres, a new center for sustainable agriculture where Sunergy installed a 26 kW Day4 Energy system.

Jonathan William Held / photon-pictures.com (2)

responsibility for selecting a system integrator, operating the PV system and distributing incentive payments. Tangerine has 4 projects underway in western Washington, including 1 that's planned for a site near the Island Community Solar installation on Whidbey Island.

Four more years?

There are other exciting developments underway in Washington. A Seattle nonprofit called Northwest Seed is acting as a clearinghouse for innovative ways to manage PV projects. Irvine joined the staff as a project manager in charge of the community solar program after working with Northwest Seed as a member of the Whidbey Island neighbors group. Another staff member, Alexandra Sawyer, has been running Northwest Seed's Solarize Seattle campaign. The initiative borrows the idea from nearby Portland, Oregon, that large groups of neighbors who together buy PV systems can get big price breaks on the installations. In the future, Northwest Seed plans to train

other groups to run bulk purchase campaigns of their own.

Though the community solar program has been slow to get off the ground, it triggered a policy discussion that might help jumpstart the commercial PV market, which has been stalled because of regulatory uncertainty. The industry wants to be certain that third-party solar electricity producers won't be treated as public utilities by Washington Utilities and Transportation Commission.

In September, Keyes & Fox, a California-based law firm that works for the National Renewable Energy Laboratory, published an assessment regarding the viability of third-party-owned renewable energy systems in Washington. The firm said that state law suggests commercial PV projects would not be treated as public utilities by the regulatory commission.

A clear ruling from the state or utilities commission allowing third-party ownership would be a boon for Wash-

ington's PV industry. It would allow the widespread use of power purchase agreements in commercial and residential markets. These financing deals have been a key feature in active solar states such as California, Colorado and New Jersey.

Third-party ownership would ease Washington's dependence on the incentive program, opening up a much-needed alternate source of financing given the likelihood that the state incentive will disappear. The trouble with the state incentive is, with each successful jump in PV installation activity, the pool of available funds gets smaller.

Smithson, the Puget Sound Solar co-owner, has been keeping track of the diminishing subsidy budgets. He says payouts from Puget Sound Energy nearly doubled in the last year to about half a million dollars. The funding limit is \$11 million. »If it keeps doubling,« he says, from \$1 million to \$2 million and onwards, »we've got 4 years to go.«

Matthew Hirsch

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Washington fact sheet

BASICS

Population

6,724,540

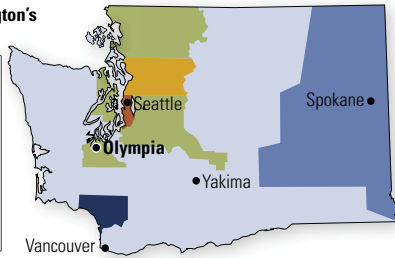
source: US Census

Utility structure

Washington has a diverse collection of power companies selling electricity around the state. The Bonneville Power Administration, a federal agency created in the 1930s, serves as a clearinghouse for wholesale electricity throughout the Pacific Northwest. Including BPA itself, 62 utilities in total deliver energy to about 3.2 million customers in Washington. The vast majority of these are public power companies owned by local governments and electricity cooperatives. Three investor-owned utilities operate in Washington: Avista Corp., PacifiCorp and Washington's largest utility, Puget Sound Energy.

Service areas for Washington's largest electric utilities

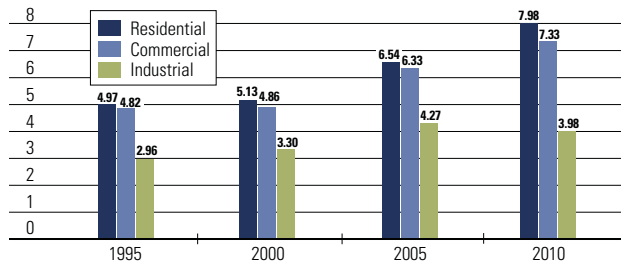
- Puget Sound Energy
- Seattle City Light
- Snohomish County Public Utility District
- Avista Corp.
- Cowlitz County Public Utility District



source: US Energy Information Administration

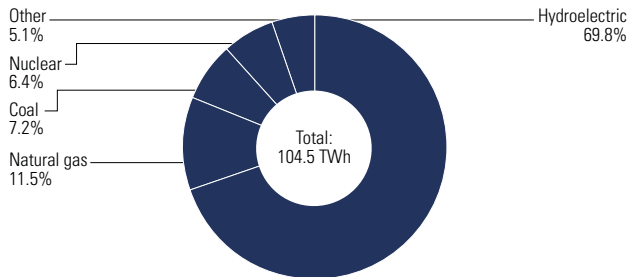
Electricity prices (¢/kWh)

An abundance of hydropower keeps retail electricity rates in Washington among the cheapest in the US. Last year, average rates in Washington were 33 percent below the national average.



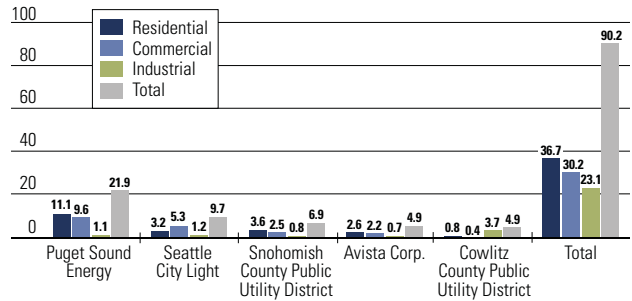
source: US Energy Information Administration

Electricity generation 2009



source: US Energy Information Administration

Electricity sales 2009 (TWh)



source: US Energy Information Administration

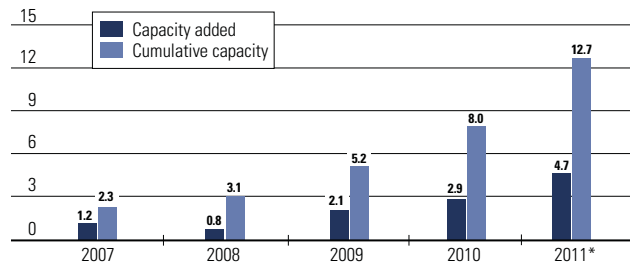
PV system prices

Residential with out-of-state modules: \$3.75 to \$6.25 per W
 Residential with Washington-made modules: \$6 to \$9 per W

source: Washington installers

The tariff rate for electricity produced by Washington-made solar modules is almost four times as high as the rate for out-of-state modules. System owners pay a premium up front, but they can get a faster return on investment. Because tariff payments are capped at \$5,000 per year, there is virtually no commercial market in Washington.

Installed PV capacity (MW)



source: Washington State University Extension Energy Program, Interstate Renewable Energy Council

*2011 data reflects installations through October

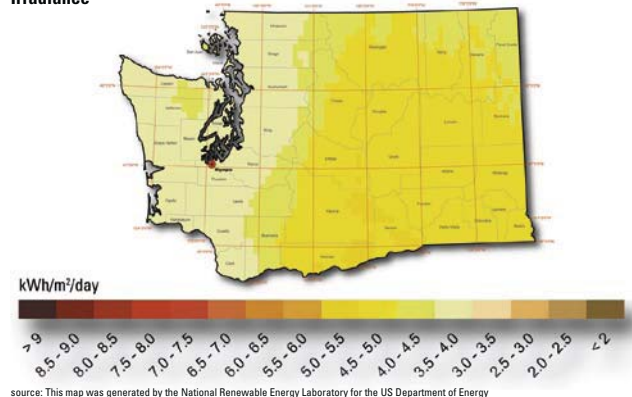
Per-capita installed PV capacity 2011

<1 W

Portion of solar in the state energy mix

0.00014%

Irradiance



SUPPORT

Net metering

Washington's net-metering law, enacted in 1998, applies to all electric utilities in the state, including city-owned utilities and electric cooperatives. PV systems up to 100 kW are eligible, but utilities can close the program to new participants once they reach 0.25 percent of peak energy demand, as it was in 1996. This gives Washington about 63 MW of net-metering capacity. The program cap doubles to 0.5 percent in 2014. Credits for excess generation carry over from one month to the next, but after 12 months any remaining credits revert back to the utility with no compensation to the system owner.

Rebates

Richland, a small city in Southeastern Washington, offers its electricity customers a 50¢ per W rebate on systems up to 5 kW. The city takes allrenewable energy credits. The Snohomish County Public Utility District's Solar Express program offers a 50¢ per W rebate. The incentive is available for residential systems up to 5 kW and commercial systems up to 20 kW. Homeowners can also apply for a low-interest loan on PV projects, but they have to choose between the cash incentive and the loan; they can't have both.

State tax credit

In July, a 100-percent sales and use tax exemption for PV systems over 1 kW was reduced to a 75-percent exemption. The tax break remains in effect until July 2013.

Feed-in tariff

PV systems operating in Washington since mid-2005 are eligible for a tariff rate worth anywhere from 15¢ per kWh all the way up to \$1.08 per kWh. Here's how the rate structure works: the base rate is 15¢; systems using Washington-made modules but out-of-state inverters get 36¢; systems with both Washington-made modules and Washington-made inverters get 54¢; and systems certified as community solar projects according to a 2009 state law earn \$1.08. The incentive is available at a fixed rate through June 2020, but no one can collect more than \$5,000 per year. This effectively limits investments to 10 kW per system operator. Overall tariff payments are capped at 0.5 percent of each utility's power sales, or \$100,000, whichever is greater. Once the limit is reached, the utility can close the program to new participants or reduce the tariff rate for everyone. Investors who claim tariff payments can also participate in net metering.

INDUSTRY

Manufacturing

Washington has three manufacturers with products certified for the state's renewable energy feed-in tariff. **Silicon Energy LLC** makes multicrystalline modules on a 6 MW production line at its Marysville factory. Silicon Energy soon plans to start inverter production so it can offer a complete made-in-Washington PV system. **Itek Energy Inc.**, out of Bellingham, has 30 MW of capacity to produce its monocrystalline modules. It too promises in-state inverter production in the near future. Arlington-based **Outback Power Technologies Inc.** has produced inverters in Washington for over 10 years. Its specialty is off-grid systems and grid-tied systems with battery backup. In August, Outback got certification from the state Department of Revenue so its customers can receive the feed-in tariff.

Three other solar manufacturers operate in Washington, but their products are not eligible for the installation incentive. They are REC Silicon Inc., a subsidiary of the Norwegian polysilicon producer REC ASA, with 19,000 MT of production capacity in Moses Lake, balance-of-systems supplier Midnite Solar in Arlington, and off-grid inverter maker Magnum Energy Inc. from Everett.

Jobs 2010

PHOTON estimate: 80 manufacturing jobs, 16 integrator jobs

Associations, institutes and other organizations

Northwest Seed

The Seattle-based nonprofit Northwest Seed provides educational information and hands-on assistance to groups that wish to organize community solar development projects and bulk PV purchase campaigns.

www.nwseed.org

Clean Energy Technology Center

Housed in a zero-energy demonstration house on the Shoreline Community College campus, the Clean Energy Technology Center works with students, policymakers and energy industry planners to build up the PV market in Washington.

www.northwestsolarcenter.org

INDUSTRY

Solar Washington

Solar Washington is a member organization affiliated with the American Solar Energy Society. The group maintains an active listing of local solar news and events on its website. www.solarwa.org

ADDITIONAL INFORMATION

Solar-related bills recently approved by the state Legislature

none

Significant renewable energy laws

A voter initiative in 2006 established a statewide Renewable Energy Standard (RES) for Washington's electric utilities that have 25,000 customers or more. The ensuing law, Washington Administrative Code (WAC) 480-109, applies to 17 of Washington's 62 utilities. It sets the power companies on a path toward producing 15 percent of their energy mix from renewable sources by 2020. A preliminary requirement of 3 percent from renewable energy sets in at the start of 2012, and a 9-percent benchmark arrives in 2016. There is no specific mandate under the law for PV power production.

Washington's interconnection standard got the second-worst possible grade, a D, from the 2011 edition of Freeing the Grid, a publication about best practices in renewable energy created by the Vote Solar Initiative and Network for New Energy Choices. The rules found in WAC 480-108 require small-scale PV system owners to take out a liability insurance policy if they don't participate in net metering. They also lead small-scale system owners to hook up an external disconnect switch, a step that drives up the cost of installation and that many other states have eliminated.

A law passed in 1979 (RCW 64.04.140) allows property owners to issue solar easements. The law was amended in 2009 to prevent homeowners' associations from outlawing PV projects in their neighborhoods.

State incentives to attract PV manufacturers

PV manufacturers can claim a reduced business and occupation tax rate of 0.275 percent. The state Department of Revenue manages this tax incentive, which stays on the books until July 2014.

Largest PV system in the state

A 782 kW Solyndra system at Centurylink Field, the home stadium of the Seattle Sounders FC soccer club and the Seattle Seahawks football team.

For further information on PV in Washington state, please contact PHOTON editor Matthew Hirsch at matthew.hirsch@photon-magazine.us.

last updated: November 2011

Profiles past and present

Canada

Ontario (PHOTON 2-2010)

USA

Arizona (PHOTON 7-2010)

Arkansas (PHOTON 6-2010)

California (PHOTON 10-2011)

Colorado (PHOTON 4-2010)

Connecticut (PHOTON 1-2010)

Florida (PHOTON 10-2010)

Georgia (PHOTON 4-2011)

Hawaii (PHOTON 8-2010)

Idaho (PHOTON 3-2010)

Mississippi (PHOTON 11-2010)

Nebraska (PHOTON 9-2010)

Nevada (PHOTON 1-2011)

New Mexico (PHOTON 2-2011)

New York (PHOTON 7-2011)

North Carolina (PHOTON 11-2011)

Oregon (PHOTON 6-2011)

Pennsylvania (PHOTON 9-2011)

Rhode Island (PHOTON 8-2011)

Tennessee (PHOTON 5-2011)

Texas (PHOTON 12-2009)

Vermont (PHOTON 5-2010)

West Virginia (PHOTON 3-2011)

Puerto Rico

(PHOTON 12-2010)