



May 18, 2026

The Honorable Rebecca Himschoot, Chair  
House Community and Regional Affairs Committee  
Alaska State Legislature

Re: Comments on Amendment #2 to CSSB 250(CRA)

Dear Chair Himschoot and Members of the Committee:

Yesterday, GVEA submitted comments to the Committee regarding SB 250 and our concerns about creating new prescriptive statutory frameworks governing utility operations and regulation. Because Amendment #2 to CSSB 250(CRA) was introduced shortly thereafter and includes significant new net metering provisions, we wanted to promptly provide comments about the amendment.

To reiterate several points raised in our SB 250 comments:

- Existing Regulatory Commission of Alaska (RCA) processes already allow utilities to address complex utility issues through tariffs, special contracts, technical analysis, and RCA review.
- Prescriptive statutory frameworks may unintentionally limit the ability of utilities and regulators to adapt to evolving operational and market conditions.
- Utilities already rely on engineers, financial experts, legal counsel, and RCA oversight to evaluate reliability, infrastructure needs, system impacts, financial risk, and cost allocation.
- The community benefit agreement provisions in SB 250 may create operational, regulatory, and financial uncertainty through requirements that fall outside normal utility regulation and utility control.
- Portions of SB 250 may conflict with or create uncertainty regarding ongoing Railbelt Transmission Organization (RTO) and Non-Discriminatory Open Access Transmission Tariff (NOATT) proceedings already underway before the RCA.
- Major utility policy decisions should be thoroughly vetted with utilities, regulators, and stakeholders before being codified into statute.

With respect to Amendment #2's net metering provisions, GVEA offers the following concerns:

- Crediting excess generation at the customer's retail rate raises concerns about cost shifting to non-participating consumers, including lower-income consumers who may not have the ability to install distributed generation systems.
- The amendment creates a prescriptive statewide net metering framework that may not adequately reflect the diversity and operational realities of Alaska's electric systems.
- Alaska utilities have successfully operated under RCA-approved net metering regulations for more than a decade, using utility-specific tariffs tailored to individual systems.
- The RCA already has processes in place to evaluate whether net metering tariffs are just, reasonable, and non-discriminatory.
- Net metering policies are highly system-specific and should be addressed through RCA proceedings and utility tariff development rather than fixed statutory mandates.
- While the amendment includes a two-percent annual rate impact threshold for non-participating consumers, questions remain regarding how those impacts would be measured and mitigated in practice.
- Utilities serving isolated and constrained systems must retain sufficient flexibility to address reliability concerns, transmission limitations, generation balancing requirements, and evolving system conditions.
- Provisions limiting the ability to restrict participation based on aggregate system penetration may reduce the operational flexibility needed for long-term system reliability.
- The amendment's long-term participation and grandfathering provisions extending through 2037 and 2044 may create future operational and regulatory uncertainty.
- The RCA's existing regulatory framework already provides a transparent process for stakeholder input, technical review, and ongoing policy adjustments as technologies and system conditions evolve.

As noted in GVEA's previous comments, given the technical and operational complexity of these issues, additional input and invited testimony from utilities, regulators, and stakeholders would support a more thorough evaluation of the proposed legislation.

Thank you for your consideration of GVEA's concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Travis Million". The signature is fluid and cursive, with a large initial "T" and a long horizontal stroke extending to the right.

Travis Million  
Chief Executive Officer  
Golden Valley Electric Association

Cc: Members of the House Community & Regional Affairs Committee  
Members of the Interior Delegation