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Overall, PV project costs have declined since 2010.[5] The decreased costs have benefitted residential, commercial, and utility-scale PV systems. Residential system costs (\$/Watt) of 5.7 kW system size have dropped from \$7.24 in 2010 to \$2.80 in 2017; commercial system costs of 200 kW have dropped from \$5.36 in 2010 to \$1.85 in 2017; and utility-scale system costs of 100 MW have dropped from an average of \$5.00 in 2010 to \$1.07 in 2017.[6] As such, the overall costs of PV projects have been declining drastically.

The proposed changes to PURPA would increase both project costs and volatility by (1) decreasing prospective QF value by forcing more QFs to compete in Regional Transmission Organization ("RTO") and Independent System Operators ("ISO") markets, thereby lowering the rates at which their energy is sold and the certainty that it will be sold; and by (2) increasing regulatory uncertainty and any associated transaction costs by changing the "one-mile rule" into a rebuttable presumption rather than a clear bright-line rule. [44]

The bill could would cause further harm to the solar industry at a state-by-state level, since it would allow state utility commissions to waive a utility"s "must-purchase" obligations. Allowing state utility commissions to opt out of PURPA's "must-purchase" obligations, even for QFs below 2.5 MW to whom the obligation would otherwise apply, would devalue investments and increase the volatility of all investments. As such, the proposed bill would negatively affect even systems below the 2.5 MW threshold.

While many recent federal policy changes, whether already enacted or proposed, are imposing costs or uncertainty on the PV solar industry, FERC's recently-issued final rule on electric storage participation in regional markets may benefit the industry, provided the resolution of certain questions and ambiguities favor solar facilities.



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