

Infrastructure for America's Leading Community Solar Market

New York leads the nation in community solar deployment, with more than 2 gigawatts of Community Distributed Generation (CDG) in operation.

CDG is a powerful tool to expand access to clean energy benefits among low-income New Yorkers, supporting progress toward the legislatively mandated clean energy and equity goals in the Climate Leadership and Community Protection Act (CLCPA).

Between the existing multi-gigawatt pipeline of CDG projects and New York's efforts to overcome siting and interconnection challenges, we are poised for a decade of rapid CDG deployment.

Modern, efficient utility billing & crediting systems are critical infrastructure for New York's CDG market to continue to grow and thrive.

NYSEIA and CCSA thank NYSERDA, DPS Staff and the Joint Utilities for working collaboratively with the industry to build that infrastructure.



Priority #1: Timely and Accurate CDG Credits

Challenge: for the last two years, New York's utilities have not consistently issued timely and accurate CDG credits. Timely and accurate credits are essential for a functional CDG market. Delayed and erroneous credit undermine New York's community solar programs by depriving customers of their savings and depriving CDG hosts of compensation for their solar energy. Conversely, timely and accurate credits build trust in New York's community solar programs, reducing costs to ratepayers by lowering the cost of capital and customer acquisition costs.

Proposed Solution: NYSEIA and CCSA appreciate the recently filed <u>DPS Staff proposal to establish CDG performance metrics</u> and negative revenue adjustments to address this challenge (Case 15-E-0082).

While this matter will be addressed by the Commission, the CDG Billing & Crediting Working Group remains an important venue for status updates and communication regarding utility automation and efforts to provide accurate and timely credits to customers. Industry stakeholders welcome feedback or suggestions from the Joint Utilities (JU) regarding ways that CDG Hosts can assist in this effort.

Net Crediting Enhancements

ltem	Description	Primary benefits	Scale of impact	Industry priority
Net Crediting for Volumetric CDG Projects	Implement net crediting for the subset of CDG customers served by projects compensated under volumetric NEM.	Eliminate dual billing for thousands of customers, increasing customer satisfaction, retention and CDG revenue realization. Incremental revenue for utilities.	Medium	High
Multiple Saving Rates for Net Crediting Projects	Currently, CDG projects participating in net crediting are only able to offer one discount rate. However, NYSERDA and federal incentive programs require deeper discounts for LMI customers. Enabling multiple discount rates for a single net crediting project will allow more projects to serve LMI subscribers. It will also help future-proof community solar by providing industry with greater flexibility to align legacy projects with future market conditions.	Increased supply of CDG for LMI subscribers, lower cost to serve LMI subscribers, future-proofing CDG projects	High	High
Net Crediting for Remote Crediting	Currently, net crediting is not available for remote crediting. The lack of net crediting increases the creditworthiness threshold for remote crediting offtakers, barring many small businesses from participating. Enabling net crediting for remote crediting will expand access to DG bill savings among businesses.	Expanded access to remote crediting among small businesses, nonprofits and multifamily buildings	Medium	Medium

NYSEIA and CCSA thank the JU for filing proposals to implement two of these CDG crediting enhancements in October 2023, and look forward to Commission Orders on these matters.

CDG Host Reporting

Item	Description		Scale of impact	Industry priority
Standardize CDG Host Statements Statewide	Currently, CDG Host Statements vary widely among the utilities. Some utilities' statements omit important information, and each utility uses different terminology/definitions. Standardizing the data that is included on CDG Host Statements will reduce confusion for all parties.	Increased accuracy/transparency, time savings for CDG providers and utility personnel	Medium	High
Provide CDG Host net crediting payments and statements concurrently and in an auditable manner	Currently, utilities frequently combine multiple CDG host statements into a single ACH payment to CDG Hosts participating in net crediting. This practice makes it difficult and time consuming for CDG Hosts to accurately account for revenue by project. Industry requests that the utilities provide separate payments for each CDG Host Statement, with a unique identifier to enable CDG providers to validate payments and ensure that funds are appropriately accounted for.	Increased accuracy/transparency, time savings for CDG providers	Medium	Medium
Customer Credit visibility/transparenc y for CDG subscriber managers	Pursuant to its most recent rate case, Con Edison is required to issue a \$10/month Customer Credit in cases where Con Edison is delinquent on issuing CDG credits. However, Con Edison indicated that this credit will simply be combined with the CDG credits in the "Adjustments" line item on the customer bill. This comingling will result in customer confusion and customer service complaints/inquiries. Industry would like to see this itemized on customer bills and CDG host statements for awareness. NYSEIA and CCSA note that the Customer Credit concept is included in pending rate cases in RG&E and NYSEG, as well as the DPS Staff proposal for CDG Performance Metrics and NRAs.	Improved customer experience, increased accuracy/transparency, time savings for CDG providers		Medium

Software Modernization

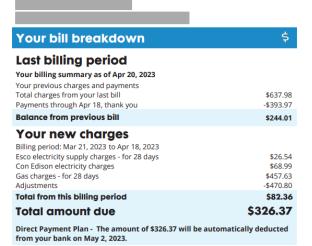
ltem	Description	Primary benefits	Scale of impact	Industry priority
CDG Host Statements in Machine-Readable Format	or via API would eliminate human error and improve the efficiency of	Efficiency improvements for	Medium	Medium
Develop API and/or self-serve interface that allows CDG providers to update host allocations themselves	Currently, the process for updating CDG host allocations uses email/spreadsheets and requires utility staff to receive, review and upload spreadsheets to make changes on behalf of CDG subscriber managers. This process is tedious, time consuming, and prone to error. Building a modern self-service application could eliminate user error and ease administrative burden for the utilities and the CDG subscriber manager, resulting in lower costs and improved customer experience.	Reduction in administrative burden for utilities and CDG providers. Lower cost. Improved customer experience due to speed	High	Medium
Standardize the method of CDG host allocation submission and tracking	Currently, utilities have different methods for receiving CDG Host Allocation forms. Some utilities accept the forms through an online portal while others accept CDG Host Allocation forms via email. The variable methods and email-based submission can result in errors, especially in cases where a CDG Host submits multiple allocation forms in close succession. Standardizing the method of CDG host allocation form submission, review, approval and tracking will support efficiency improvements and reduce billing & crediting errors.		Medium	Medium

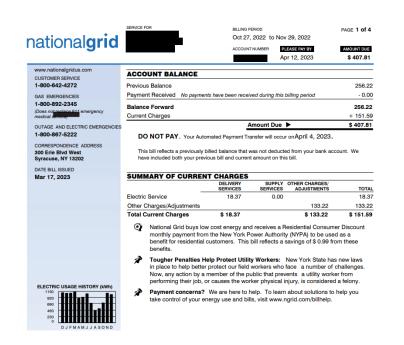
Customer Communication

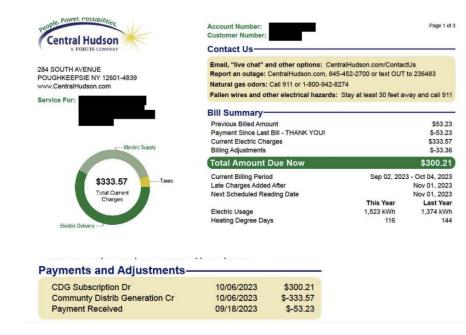
ltem	Description	Primary benefits	Scale of impact	Industry priority
Clearer language on customer bill describing CDG credits	Currently, solar bill credits are presented on some customer bills as an "Adjustment" which is confusing for customers, CDG providers, and utility customer support staff. Clearer language and itemized bills could minimize confusion.	Improved customer experience, decreased customer service workload for CDG providers and utilities	High	Medium
Enable CDG providers to customize language on customer bill	Currently, there is no way for a CDG customer to see who their CDG provider is on their utility bill. Allowing CDG providers to provide a customized message could improve customer experience and reduce confusion.	Improved customer sexperience, decreased customer service workload for CDG providers and utilities	Low	Low

Customer Communication: Sample Bills









Page 3 of 4

Billing

Period

32 days

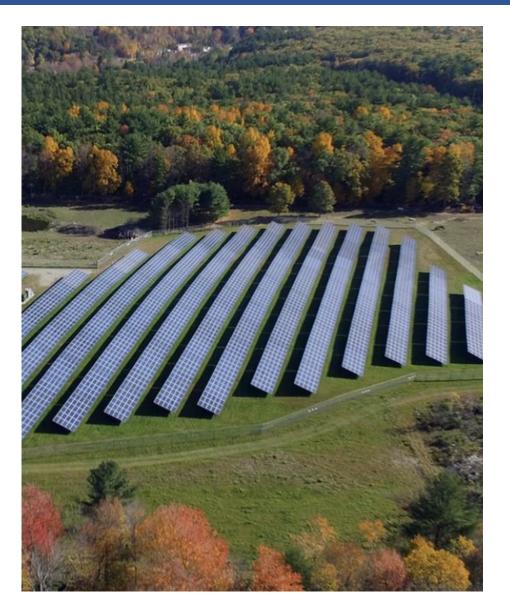
Meter d	letail – billing perio	od from F	eb 22, 20	23 to Mar	24, 2023	(30 days)		
Meter #	New Reading Reading Typ	e Date	Prior Reading	Reading Type	Date	Reading Difference	M	Total Use
	11633	Actual	Mar 24	11297	Actual	Feb 22 336	1	336 KV
CDG Credit S								
O KWH		Current Month	Allocation			Ho Allocation	Current Billed KWH 336 KWH	Carryover KV
CDG Credit: S4			ption Fee: \$39.56	Net Cred	lit Applied: \$4.	•	330 KWH	0 10
Your Su	upply Charges						elivery Charges	
ELECTRIC (Basic Servi	ice Charge	\$21.50
Feb 22-Mar 24 336 KWH @ 14.1900¢					First 250 k	(WH @ 9.529¢ each	23.82	
Your electricity supplier: Constellation New Energy MM				Next 86 K	WH @ 9.529¢ each	8,19		
Address: 1001 LOUISIANA STREET HOUSTON TX 77002			Energy Cst	Adj 336 KWH @ 0.29400 ¢	.99			
							harge 336 KWH @ 0.02200¢	.07
Total elec	tric supply charges			47.6	1	VDC 33V N	WH @ 105KOE	- 35
Phone:	855-465-1244					RDM Adjustmer	nt 336 KWH @ -0.76800 ¢	-2.
Email:	home@constellation	.com				Transition Adj (Chg 336 KWH @ -0.05100¢	-0.
							WH @ 0.57300¢ charges - Delivery	11
						Total electric	delivery charges	\$54.
						Your electri	city total	\$102.1

Service Address: **CORNING NY 14830** NYSEG DETAILED ACCOUNT ACTIVITY Service from: 08/26/23 - 09/26/23 Electricity Service - Residential Electricity Rate - 12001 NYSEG Supply Service PoD ID: Current Meter Read Previous Meter Read Meter Reading Billed Date Reading Date Reading Difference Number Usage Type of read: A - Actual, E - Estimate, C - Customer, R - Remote and N - No read Period End Prior Excess Current CDG **CDG** Generation Remaining CDG CDG Generation Generation Applied Generation 09/26/23 4210 kwh 3711 kwh 928 kwh 710 kwh

Other Items

ltem	Description	Primary benefits	Scale of impact	Industry priority
Standardize the customer assignment date	Currently, utilities have different triggers for assigning CDG customers to projects. The lack of standardization can create confusion/challenges for CDG enrollment companies in cases when customers sign up for multiple projects.	Standardization	Low	Low
Enable CDG subscriber managers to pool/aggregate credits from small CDG projects with common ownership	Currently, it is administratively burdensome for the utilities and subscriber managers to implement CDG crediting for small CDG projects. This issue is most relevant to Con Edison territory, where developers and affordable housing groups are often seeking to financing and build portfolios of small rooftop CDG projects, such as NYCHA's rooftop community solar program. Enabling CDG subscriber managers to aggregate projects with shared ownership and to utilize a single host allocation for the aggregation will lower the cost of serving these customers for the utilities and CDG companies while enabling more small CDG project and increasing the overall supply of CDG in denser areas of the state (Con Edison).	rooftop community solar. Increased CDG supply in Con Edison territory. Reduced administrative burden and cost for utilities	Low	Low

Conclusion



Modern, efficient utility billing & crediting systems are critical infrastructure for New York's CDG market to continue to grow and thrive.

CDG is a relatively new program, and functionality is still being developed to provide CDG customers with adequate service and to ensure that New York's CDG program remains the best in the nation.

The CDG Billing & Crediting Working Group was established to foster collaboration between the utilities and industry to identify/address issues and also to identify opportunities to improve the program for customers. New York's CDG program is poised for record growth in the years ahead, and the efforts of this working group are more important than ever.

NYSEIA and CCSA thank NYSERDA, DPS Staff and the Joint Utilities for working collaboratively with the industry to improve CDG billing & crediting. We look forward to a productive year!

