



CDG Billing & Crediting Working Group

NY Solar Industry 2024 Priorities

January 22, 2024

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 [DPS Staff proposal to establish CDG performance metrics](#) 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

Item	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	Primary benefits	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 and utility personnel	Medium	Medium
Customer Credit visibility/transparency 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 and utility personnel	Medium	Medium


Software Modernization

Item	Description	Primary benefits	Scale of impact	Industry priority
CDG Host Statements in Machine-Readable Format	Currently, utilities provide CDG host statements in PDFs without any computer-readable format. Providing CDG Host Statements in Excel or via API would eliminate human error and improve the efficiency of CDG billing & crediting.	Efficiency improvements for CDG, reduced billing & crediting errors	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 and improved accuracy.	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.	Standardization, reduced billing & crediting errors	Medium	Medium

Customer Communication

Item	Description	Primary benefits	Scale of impact	Industry priority
<p>Clearer language on customer bill describing CDG credits</p>	<p>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.</p>	<p>Improved customer experience, decreased customer service workload for CDG providers and utilities</p>	<p>High</p>	<p>Medium</p>
<p>Enable CDG providers to customize language on customer bill</p>	<p>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.</p>	<p>Improved customer experience, decreased customer service workload for CDG providers and utilities</p>	<p>Low</p>	<p>Low</p>

Customer Communication: Sample Bills



Your bill breakdown \$

Last billing period
Your billing summary as of Apr 20, 2023
Your previous charges and payments
Total charges from your last bill \$637.98
Payments through Apr 18, thank you -\$393.97


Balance from previous bill **\$244.01**

Your new charges
Billing period: Mar 21, 2023 to Apr 18, 2023
Esco electricity supply charges - for 28 days \$26.54
Con Edison electricity charges \$68.99
Gas charges - for 28 days \$457.63
Adjustments -\$470.80

Total from this billing period **\$82.36**

Total amount due **\$326.37**

Direct Payment Plan - The amount of \$326.37 will be automatically deducted from your bank on May 2, 2023.



SERVICE FOR: [REDACTED] BILLING PERIOD: Oct 27, 2022 to Nov 29, 2022 PAGE 1 of 4
ACCOUNT NUMBER: [REDACTED] PLEASE PAY BY: Apr 12, 2023 AMOUNT DUE: \$ 407.81

www.nationalgridus.com
CUSTOMER SERVICE 1-800-642-4272
GAS EMERGENCIES 1-800-892-2345
(Does not replace 911 emergency medical services)
OUTAGE AND ELECTRIC EMERGENCIES 1-800-867-5222
CORRESPONDENCE ADDRESS
300 Erie Blvd West
Syracuse, NY 13202
DATE BILL ISSUED
Mar 17, 2023


ACCOUNT BALANCE
Previous Balance 256.22
Payment Received No payments have been received during this billing period - 0.00
Balance Forward 256.22
Current Charges + 151.59
Amount Due \$ 407.81

DO NOT PAY. Your Automated Payment Transfer will occur on April 4, 2023.
This bill reflects a previously billed balance that was not deducted from your bank account. We have included both your previous bill and current amount on this bill.

SUMMARY OF CURRENT CHARGES

	DELIVERY SERVICES	SUPPLY SERVICES	OTHER CHARGES/ADJUSTMENTS	TOTAL
Electric Service	18.37	0.00		18.37
Other Charges/Adjustments			133.22	133.22
Total Current Charges	\$ 18.37	\$ 0.00	\$ 133.22	\$ 151.59

ELECTRIC USAGE HISTORY (kWh)
Bar chart showing usage from Dec to Feb. Values range from 0 to 115 kWh.



284 SOUTH AVENUE
POUGHKEEPSIE NY 12601-4839
www.CentralHudson.com
Service For: [REDACTED]

Account Number: [REDACTED] Page 1 of 3
Customer Number: [REDACTED]

Contact Us
Email, "live chat" and other options: CentralHudson.com/ContactUs
Report an outage: CentralHudson.com, 845-452-2700 or text OUT to 236483
Natural gas odors: Call 911 or 1-800-942-8274
Fallen wires and other electrical hazards: Stay at least 30 feet away and call 911

Bill Summary
Previous Billed Amount \$53.23
Payment Since Last Bill - THANK YOU! -\$53.23
Current Electric Charges \$333.57
Billing Adjustments -\$33.36

Total Amount Due Now **\$300.21**

Current Billing Period Sep 02, 2023 - Oct 04, 2023
Late Charges Added After Nov 01, 2023
Next Scheduled Reading Date Nov 01, 2023

Electric Usage This Year 1,523 kWh Last Year 1,374 kWh
Heating Degree Days 116 144

Payments and Adjustments

CDG Subscription Dr	10/06/2023	\$300.21
Community Distrib Generation Cr	10/06/2023	-\$333.57
Payment Received	09/18/2023	-\$53.23

\$333.57 Total Current Charges
Donut chart showing breakdown: Electric Supply (majority), Taxes, and Electric Delivery.

Your electric breakdown (Rate: ELECTRIC RESIDENTIAL - DELIVERY)

Meter detail - billing period from Feb 22, 2023 to Mar 24, 2023 (30 days)

Meter #	New Reading	Reading Type	Date	Prior Reading	Reading Type	Date	Reading Difference	M	Total Usage
11633	Actual		Mar 24	11297	Actual	Feb 22	336	1	336 KWH

CDG Credit Summary:
Prior KWH Current Month Allocation No Allocation Current Billed KWH Carryover KWH
0 KWH -184 KWH 0 336 KWH 0 KWH
CDG Credit: \$43.95 Savings Rate: 10.00% CDG Subscription Fee: \$39.36 Net Credit Applied: \$4.39

Your Supply Charges 47.68
ELECTRIC CHARGES
Feb 22-Mar 24 336 KWH @ 14.1900¢
Your electricity supplier: Constellation New Energy MM
Address: 1001 LOUISIANA STREET HOUSTON TX 77002

Your Delivery Charges
Basic Service Charge \$21.50
First 250 KWH @ 9.529¢ each 23.82
Next 86 KWH @ 9.529¢ each 8.19
Energy Cst Adj 336 KWH @ 0.29400¢ .99
EVMR Surcharge 336 KWH @ 0.02200¢ .07
NDC 236 KWH @ .110¢ each .26

RDM Adjustment 336 KWH @ -0.76800¢ -2.58
Transition Adj Chg 336 KWH @ -0.05100¢ -0.17
SBC Cha 336 KWH @ 0.57300¢ 1.93
Government surcharges - Delivery 1.06

Total electric supply charges 47.68
Total electric delivery charges \$54.46
Your electricity total **\$102.14**

Understanding your bill

Service Address: [REDACTED] CORNING NY 14830 Page 3 of 4
NYSEG DETAILED ACCOUNT ACTIVITY

Electricity Service - Residential
Electricity Rate - 12001 NYSEG Supply Service
Service from: 08/26/23 - 09/26/23
PoD ID: N01 [REDACTED]

Meter Number	Current Meter Read Date	Current Meter Read Reading	Previous Meter Read Date	Previous Meter Read Reading	Reading Difference	Billed Usage	Billing Period
[REDACTED]	09/26/23	26560 A	08/26/23	26131 E	429	429 kwh	32 days

Type of read: A - Actual, E - Estimate, C - Customer, R - Remote and N - No read

Period End Date	Prior Excess CDG Generation	Current CDG Generation	CDG Generation Applied	Remaining CDG Generation
09/26/23	3711 kwh	928 kwh	710 kwh	4210 kwh

Other Items

Item	Description	Primary benefits	Scale of impact	Industry priority
<p>Standardize the customer assignment date</p>	<p>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.</p>	<p>Standardization</p>	<p>Low</p>	<p>Low</p>
<p>Enable CDG subscriber managers to pool/aggregate credits from small CDG projects with common ownership</p>	<p>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).</p>	<p>Increased viability to build rooftop community solar. Increased CDG supply in Con Edison territory. Reduced administrative burden and cost for utilities and CDG providers.</p>	<p>Low</p>	<p>Low</p>

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!



Thank you!