

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 19-M-0463 - In the Matter of Consolidated Billing for
Distributed Energy Resources.

NOTICE SEEKING COMMENTS REGARDING CONSOLIDATED BILLING FOR
COMMUNITY DISTRIBUTED GENERATION

(Issued June 18, 2019)

On March 9, 2017, the Public Service Commission (Commission) issued an Order on Net Metering Transition, Phase One of Value of Distributed Energy Resources, and Related Matters (VDER Transition Order).¹ In the VDER Transition Order, the Commission directed Department of Public Service Staff (Staff) to confer with utilities and market participants and evaluate and report to the Commission: whether utilities should enable utility consolidated billing for Community Distributed Generation (CDG) projects; the actions required to do so; and the conditions required to make such billing work properly and to ensure consumers and ratepayers are appropriately protected. Currently, while the bill credits appear directly on CDG subscribers' utility bills, the CDG Sponsor must send the customer a separate bill for the subscription and must separately collect the subscription charge. Consolidated billing would enable the Sponsor to instead inform the utility of the subscription charge, which would then be added to the utility bill and remitted to the Sponsor by the utility.

Subsequently, on September 14, 2017, the Commission issued an Order on Phase One Value of Distributed Energy

¹ Case 15-E-0751, Value of Distributed Energy Resources, Order on Net Metering Transition, Phase One of Value of Distributed Energy Resources, and Related Matters (issued March 9, 2017) (VDER Transition Order).

Resources Implementation Proposals, Cost Mitigation Issues, and Related Matters (VDER Implementation Order).² There, the Commission identified consolidated billing for DER as an important opportunity to reduce soft costs associated with CDG. The Commission directed Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (Orange & Rockland), and Rochester Gas and Electric Corporation (RG&E) (collectively, the utilities) to file, within 60 days of the issuance of the VDER Implementation Order, an automation and billing report, including, among other things, an evaluation of practicality, cost, and timeline for implementing consolidated billing. The utilities each filed their automation and billing reports on November 13, 2017 in Case 15-E-0751.

PLEASE TAKE NOTICE that Case 19-M-0463, In the Matter of Consolidated Billing for Distributed Energy Resources, is established to address consolidated billing for CDG and other distributed energy resources (DERs). You are receiving this Notice because you have subscribed to a service list in a related Commission proceeding. If you wish to continue to receive notifications in this proceeding, it is necessary to subscribe to the service list. Information and instructions related to subscribing to the service list, or otherwise monitoring the status of this proceeding, may be found by entering "19-M-0463" in the Search field on the Department's

² Case 15-E-0751, Value of Distributed Energy Resources, Order on Phase One Value of Distributed Energy Resources Implementation Proposals, Cost Mitigation Issues, and Related Matters (issued September 14, 2017) (VDER Implementation Order).

website at www.dps.ny.gov, and clicking "Subscribe to Service List."

PLEASE TAKE FURTHER NOTICE that comments are sought on the institution of consolidated billing for CDG. Additionally, Staff seeks specific comments on the following questions:

1. Should consolidated billing use the "purchase of receivables" model? Should the purchase of receivables be with or without recourse?
2. Should consolidated billing require that the subscription charge for each member be set at a percentage of value of the credit received by the CDG member (e.g., a subscription charge equal to 90% of value of the credits, varying each billing period based on the credit value) or should other billing models also be enabled?
3. Should a limit be set on the amount of charges, such as a requirement that the subscription charge be less than the bill credit value?
4. Should consolidated billing be limited to specific service classes or available to all customers?
5. Should any special provisions apply to consolidated billing of low-income customers?
6. Should utilities recover the costs associated with consolidated billing through retaining a percentage of the billed amount or through another method such as a per customer fee? At what level or how should the amount of the percentage or other fee be set?
7. How should the information necessary for consolidated billing be communicated between the CDG Sponsor and the utility?

8. Are additional consumer protection rules necessary for the institution of consolidated billing, beyond those currently in the Uniform Business Practices for Distributed Energy Resource Suppliers (UBP-DERS)?
9. Beyond CDG, what other DER products and services should consolidated billing be considered for?

Comments regarding the institution of consolidated billing for CDG and the above questions should be submitted by September 3, 2019. All filings should refer to "Case 19-M-0463" and be submitted to the Secretary by e-filing, through the Department of Public Service's Document and Matter Management System (DMM), or by e-mail to the Secretary at secretary@dps.ny.gov. If unable to file electronically, commenters may make submissions by U.S. Mail or by hand delivery to the Hon. Kathleen H. Burgess, Secretary, Three Empire Plaza, Albany, New York 12223-1350. All documents submitted to the Secretary will be posted on the Department's website and become part of the official case record.

Any questions may be directed to Ted Kelly, Office of General Counsel, at Theodore.Kelly@dps.ny.gov.

(SIGNED)

KATHLEEN H. BURGESS
Secretary