



Dear Public Service Commissioners:

We are writing in response to a notice for public comments “Regarding Consolidated Billing For Community Distributed Generation”, Case 19-M-0463. As a small company that has been working to implement Community Choice Aggregation programs with Community Solar (CDG) as an integral component, we have seen how the absence of consolidated billing has stymied our efforts and has slowed the adoption of renewable generation. Several municipalities have wanted to include CDG as an opt-out feature of the CCA program, but are not willing to require all the residents and small businesses to receive an additional bill. As a result, these municipalities have not moved forward with CDG or have only allowed opt-in CDG which has a much smaller impact on penetration of CDG. We are confident that with consolidated billing municipalities will embrace CDG as an opt-out feature and we will see a robust growth in the development of CDG.

Specifically regarding the questions posed in the notice:

- (1) We feel it is not necessary for consolidated billing to follow a “purchase of receivables” model because the CDG developer is already assuming the collection risk. Furthermore, under an opt-out CDG model in a CCA program there will be ample customers to absorb any financial risk related to non-payment.
- (2) YES, consolidated billing should **require** that the subscription charge for each member be set at a percentage value of the credit received by the CDG member, specifically at most equal to 90% of the value of the credits. There should be a standard rate for customer savings that drives consumer confidence.
- (3) YES, there should be a limit set on the amount of charges. The subscription charge must be less than the bill credit value.
- (4) Consolidated billing should be available to all customers regardless of service class. In fact, there are some businesses that currently want to access local solar but are unable to do so.
- (5) Yes, special provisions should apply to low-income customers. Specifically, the savings from a CDG subscription should be applicable to the entire bill for these customers and not restricted to the supply charges.

Thank you for the consideration of these comments and we look forward to a timely resolution in favor of consolidated billing.

Regards, 
Susan Hughes-Smith, partner in Roctricity, LLC.