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December 5, 2024

VIA ELECTRONIC FILING

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: *In the Matter of In the Matter of Consolidated Billing For Distributed Energy Resources - Case No. 19-M-0463*

Dear Secretary Phillips,

Solar Simplified, a leading community solar subscriber management company in the country including management of 200+ MWs of CDG projects in New York State, is writing in support of the immediate implementation of the Net Crediting (“NC”) framework under utility consolidated billing (“UCB”) for Net Energy Metering (“NEM”) community solar projects, which is currently only available to Value of Distributed Energy Resources (“VDER”) projects.

NEM project subscribers currently receive two bills: one for distribution from the utility; and one for supply/energy from the community solar project. Through UCB, the local utility administers the billing for a community solar project, resulting in one bill to the community solar subscriber. UCB also does not require customers to submit personal financial data, leading to faster customer acquisition, approaching a wider audience of residential and low income subscribers and, again, a better customer experience.

The Public Service Commission’s (“PSC”) December 19, 2019 Order Regarding Consolidated Billing for Community Solar Distributed Generation, instituted a directive “to implement net crediting as a billing option for all CDG projects, both existing and new.” However, New York’s utilities have ignore such Commission order and delayed the implementation of UCB and NC for NEM projects which has negatively impacted subscribers and asset owners alike.

In the fall of 2023, New York’s utilities filed a petition proposing to implement UCB twelve months after the PSC issues an order approving their petition, work that has already been



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ordered exactly 5 years ago. The PSC has yet to issue an order regarding the utilities' petition and as a result it seems as though the earliest UCB for NEM/volumetric projects could be implemented is by late-2025. These delays and resulting negative subscriber experiences, as well as expanded UCB opportunities for subscribers through VDER projects, have resulted in large subscriber churn and difficulty acquiring subscribers, which is negatively impacting the economics of these debt-financed NEM projects.

These Phase One NEM subscribers were instrumental in supporting the industry during its early days when their backing was crucial in New York. However, since the rollout of UCB for VDER projects in the summer of 2021, they have been overlooked, with dual billing projects still relying on their continued support while neighboring subscribers transitioned to UCB projects. Without these early adopters, who championed DER development in New York State, today's VDER program and the successful deployment of over 6 GW of capacity would not have been possible.

Without the expansion of utility consolidated billing to include NEM projects, New York runs the risk of pushing away customers while potentially jeopardizing New York's position as the top community solar market in the United States.

Solar Simplified, alongside many industry leaders, respectfully urges you to advocate for the PSC to promptly issue an order directing utilities to implement UCB for NEM by the spring of 2025. These subscribers have endured challenges for 4 years—help us extend to them the same high-quality service we provide to our VDER subscribers and eliminate the hassle of managing two separate bills each month.

Thank you in advance for your time and consideration.
Please do not hesitate to contact the undersigned with any questions or concerns.

Sincerely,

/s/ Aviv Shalgi

CEO

Solar Simplified

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