



***CNO Community Solar
Docket No. UD-18-03
Technical Conference***



May 30, 2019

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Goals and Agenda of Technical Conference

Goals

- As described in Resolution R-19-111, the focus of this technical conference is a discussion among ENO, the Advisors, and the parties regarding the implementation plan ENO is due to file July 30.

Agenda

1. Review Procedural Schedule
2. Review ENO obligations under Rules
3. Identification and Discussion of open issues for ENO
4. Discussion of Next Steps

Procedural Schedule

<u>Milestone</u>	<u>Deadline</u>
Council Adoption of Resolution R-19-111	March 28, 2019
Rules Effective Date	May 1, 2019
Parties Comments re: Section XIV	May 28, 2019
Technical Conference re: Implementation Plan	May 30, 2019
Responsive Comments re: Section XIV	June 27, 2019
ENO files proposed Program Implementation Plan, rate schedule, CSG application procedure, and standard interconnection agreement	July 30, 2019
Parties' Comments re: ENO Implementation Plan	August 29, 2019
Advisors' Report re: Section XIV	September 1, 2019
ENO Responsive Comments re: ENO Implementation Plan	September 13, 2019
Advisors' Report re: ENO Implementation Plan	TBD
Council Approval of Section XIV and ENO Implementation Plan	TBD
Subscriber Organizations Begin Registering with Council	TBD
ENO Begins Accepting CSG Facility Applications	TBD

Community Solar Rules—Process Areas

In considering the tasks required to implement the Council's Community Solar Rules, ENO has identified five focus, or process, areas:

1. CSG Facility Application/Interconnection
2. Customer Billing/Rate Administration/Accounting
3. Legal/Regulatory
4. Reporting/Communications
5. Customer Subscription Administration

Process Area #1—Application/Interconnection

<u>Rule No.</u>	<u>Task</u>
	<u>Application/Interconnection</u>
VII.C.1.; VII.D.2-7	Develop CSG Facility Application form and procedure for reviewing submissions, notifying developers of deficiencies, receiving updates necessary to cure deficiencies, and rejecting defective applications. Must Include: <ul style="list-style-type: none"> • Proof of S.O. Registration • Proof of application for all permits • Proof of site control • CSG Facility Location, Capacity, expected kWh output
VII.D.1.	Develop application stamping protocol to track order of receipt and identification numbering system for applications
	Determine where/how applications and supporting docs will be stored.
V.A.1.	Develop process for each new CSG Facility to check that it won't cause total CSG Capacity to exceed 5% of ENO's NCP for the prior year
VII.A.1.; VII.D.14	Develop CSG Interconnection Agreement consistent with Standards DR7-01 and DR7-02 and process; interconnection process to include analysis of any potential reliability impacts (positive or negative) of interconnection at the requested location (Open Issue #1)
VII.E.6.	Develop process for monitoring distribution system to determine any adverse or beneficial effects resulting from each installed CSG Facility (Open Issue #2)
VII.D.11- 13	Develop process for collecting, accounting for, and returning \$50/kW deposit from developers who don't begin operations within 12 months of applying; forfeited deposits to be flowed to customers through the FAC

Process Area #2—Billing/Rate Admin/Accounting

<u>Rule No.</u>	<u>Task</u>
	<u>Billing/Rate Administration/Accounting</u>
VII.G.3	Develop process for tracking incremental administrative costs and develop proposed cost recovery mechanism to collect from each S.O. (Open Issue #3)
VII.G.4.	Set up GL accounts to track revenues and expenses associated with community solar program administration
VIII.D.; VIII.C.	Develop monthly manual and/or CCS process(es) to: <ul style="list-style-type: none"> • Receive subscriber lists from S.O.s; (Open Issue #4) • Collect CSG Facility meter data; • Calculate each subscriber’s monthly bill credit by multiplying metered output of the system by most recent allocations received from Subscriber Organization; • Apply credits to subscribers’ monthly bills within 2 month lag
VIII.E.	Develop manual and/or CCS process to recalculate customer credit amount either once or twice per year based on updated avoided energy LMPs and avoided capacity CONE values (Open Issue #5)
	Develop process for rendering payments to S.O.s for 20% unsubscribed energy portion
VII.A.1.	Develop rate schedule(s) for administering billing credits to subscribers [and possibly 20% payments to S.O.]

Process Area #3—Legal/Regulatory

<u>Rule No.</u>	<u>Task</u>
	<u>Legal/Regulatory</u>
IV.A.6.	Develop standard offer PPA form for purchasing output from CSG Facilities in three tranches: subscribed energy, unsubscribed energy up to 20% of output, and unsubscribed energy beyond the 20% cap (Open Issue #6)
VII.E.5.	Develop confidentiality agreement for Subscriber Organizations needing to request access to confidential or restricted information (Open Issue #7)
VII.E.7.; VIII.I.	Develop records retention process for tagging and keeping CSG Facility data for longer of 10 years or duration of community solar program; must tag and retain records of CSG Facility kWh applied to each subscriber's account for 3 years

Process Area #4—Reporting/Communications

<u>Rule No.</u>	<u>Task</u>
	<u>Reporting/Communications</u>
VII.E.2, 4; VII.F.1, 4	Develop external community solar website for entergy.com that provides: <ul style="list-style-type: none"> --a link to the Council’s community solar webpage, --public studies and materials helpful to understanding feasibility of interconnecting to the D-system; --information about current status of all pending projects (updated quarterly); --a rolling 24 month report of \$/kWh and \$/kW subscriber credits for energy and capacity
VII.F.1	Develop process for providing Council with ad hoc reports on: <ul style="list-style-type: none"> • project status, • impacts on operations, • subscriber and ratepayer impacts
VII.F.2.	Develop process for compiling annual report due May 1 each year (Open Issue #9)
VII.F.3.	Develop process for compiling semi-annual reports to Council providing lists of projects and total capacity due June 30 and December 31 each year

Process Area #5—Subscription Administration

<u>Rule No.</u>	<u>Task</u>
	<u>Part 5—Subscription Administration</u>
III.B	Develop process for verifying each customer/subscriber falls within listed limitations: <ul style="list-style-type: none"> • Total subscriptions can't exceed 100% of Baseline Annual Usage; • May not own more than 40% interest in a CSG facility
III.A.3.	Add a step to NEM interconnection process to check whether a new NEM customer is also a community solar customer and to ensure that any new NEM installation, when coupled with a community solar subscription, does not exceed 100% of the annual baseline usage. (Open Issue #10)
XI.G	Develop, in consultation with Advisors, process for transferring subscriptions and bill credits, either to another residence for the existing customer, or to another customer who steps into the subscription of the former, and for recovering costs associated with transfers from the particular Subscriber Organization;
XI.E.; Resoluti on p.65	Develop process for jointly verifying <u>with the S.O.</u> that any new party receiving a transferred subscription from a current subscriber is eligible to be a subscriber under the rules. Includes verification that subscription amount will not exceed 100% of prior year baseline annual usage at the new customer location, and if so, notification by ENO to Subscriber and Subscriber Organization that subscription must be reduced (Open Issue #12)
XIII.I.2.b, c	Develop process for sending notice of enrollment to customers who sign subscription agreement with Subscriber Organization; notice to include enumerated items of info
X.B.	Develop process for receiving and retaining Subscriber Organization certifications of L.I. status (Open Issue #11)

Open Issues

Process Area #1—Application/Interconnection

1. Section VII.E.3—Clarify what “reasonable attempts to assist” with locating projects entails
2. Section VII.E.6—Beyond interconnection analysis, difficult to assess effects of a CSG facility

Process Area #2—Billing/Rate Admin/Accounting

3. Section VII.G.& Resolution p.44—Distinction between expenses specific to a Subscriber Organization and costs associated with administrative upgrades needed to enable ENO to administer a CS program

Examples: S.O.-specific: Interconnection costs, time associated with handling subscriber onboarding such as calculating Baseline Annual Usages and issuing notice of enrollment letters, handling transfers of subscriptions

General costs: Incremental FTEs, IT coding costs for rates

4. Section VIII.B.—If S.O. is late or unresponsive in providing monthly subscriber data, ENO proposes to halt bill credits that month
5. Section VIII.E.—Prior year LMPs will be available in February; new CONE values for upcoming PY will be available in May; propose to recalculate the customer credits once per year in May, with effective date June 1-May 31

Open Issues

Process Area #3—Legal/Regulatory

6. Section IX.A.—Silent on unsubscribed energy above the 20% cap. Propose that PPA include exclusive dealing provision for unsubscribed energy >20%.
7. Section VII.E.5—Confidentiality agreement section contemplates release of info without specific customer approval. Propose that S.O. obtain signed Consent to Disclose Customer Data form from each subscriber and provide to ENO.
8. Sections XIII.D, XIII.I.1.a.xi, XIII.J.1.a.i—Contemplate customer ownership of panels rather than subscription.

Process Area #4—Reporting/Communications

9. Section VII.F.2&3—To allow time to gather data and prepare annual report after end of program year on April 30, propose to file annual report on June 30 and one semi-annual report on December 31 with the current snapshot of projects and capacity.

Process Area #5—Subscription Administration

10. Section III.A.3—If new NEM solar will put customer over 100% BAU, ENO would propose to hold the NEM application until customer provides proof of subscription reduction.
11. Section II, Definition & Section X.B.—“Low-Income Customer”=50% or less than Area Media Income for the year of subscription. Propose that S.O. recertify L.I. status to ENO in writing each year and upon transfer of subscription.
12. Section XI.D & Resolution p. 65—For subscription transfers that result in >100% of baseline, ENO proposes to limit or suspend bill credit following notice to the Subscriber and S.O. until it receives notice that Subscriber has adjusted its subscription level.

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