

**RESPONSES OF CITIZENS ACTION COALITION OF INDIANA, INDIANA
DISTRIBUTED ENERGY ALLIANCE, AND SOLAR UNITED NEIGHBORS OF
INDIANA TO IURC QUESTIONS REGARDING NET METERING PROGRAMS
JUNE 20, 2019**

We greatly appreciate the opportunity to provide responses to the IURC's net metering program questions, which begin on the following page.

First, however, we would like to respectfully reiterate our request for:

- Guidance from the Commission putting forth a standard way in which the reserved capacity carve outs can be used for other reserved capacity categories if the utility reasonably anticipates certain reserved capacity carve outs will not be used. At a minimum, we believe the intent of the statute certainly is not to limit the carve outs to an amount that would be under 1.5% of the summer peak load.
- A generic investigation for all the five investor-owned electric utilities to determine the distributed generation rates. As of now, we have customers connecting systems not knowing what their rate will be after their 15-year net metering period expires. Soon, we could have disputes if a utility refuses to honor net metering applications above the 1.5% summer peak load cap and customer projects could be stalled while waiting to figure out the distributed generation rate applicable to them. Finally, 2022 is quickly approaching and litigating 5 to 15 separate dockets (either one docket for each utility or one docket for each utility's reserved capacity) is untenable and a poor use of Commission and stakeholder resources. In order to avoid disputes and streamline this litigation, we respectfully request a generic investigation to figure out a standardized formula and methodology for determining distributed generation rates that can apply statewide to customer net metering projects in investor owned utility service territories.

(1) Quarterly Reporting on Net Metering Participation. Commission staff proposes the following schedule for quarterly reporting on net metering participation:

- Utilize the same reporting template as the annual filing in place today.
- In addition to the rule requiring year-end filing submitted by March 31 with Dec 31 data, the IOU’s will make quarterly submissions on June 30 (with March 31 data), September 30 (with June 30 data), and December 31 (with September 30 data).
- These quarterly filings will be summarized and posted to the IURC website similar to the annual report posting today.
- The quarterly reporting will continue through the September 2022 submission (with June 30, 2022 data, corresponding to the end of the net metering new customer offering period). The reporting will then revert to the rule requiring annual filings until such rule may be changed.

We are supportive of this reporting and appreciate the utilities’ responsiveness to this request. We do request that this specific aggregate information is provided: the net metering cap calculation by utility, similar to the table below from I&M’s interim net metering report.

We also request that customers be made aware that they can call the utility’s net metering point person/team to get a more real-time update as to this aggregate data, as was discussed and agreed to by the utilities at the April 10, 2019 meeting.

I&M’s net metering cap calculation:

		Indiana 2016 Cap (MW)	Indiana 2017 Cap (MW)	Indiana 2018 Cap (MW)	Installed (MW)	% of Category Cap
Updated: 11/28/2018						
Summer Peak (SP)		2889.0	3436.0	3629.0		
Capacity (1.5% of SP)	1.5%	43.3	51.5	54.4		
Residential 40%		17.3	20.6	21.8	1.98	9%
Bio-mass 15%		6.5	7.7	8.2	0.24	3%
All Other 45%		19.5	23.2	24.5	8.47	35%
Total Installed through 9/1/18:					10.7	
Total Installed of 1.5% Cap					20%	

(2) Definitions for Queue Management

- A. Definition for “net metering participant” – some possible options include:
- Apply definition consistent with GAO 2017-2 (GAO 2017-2 Appendix A Term D(2). A customer is participating in net metering when both customer and utility have a signed interconnection agreement.)
 - Participation is established when application filed.
 - Participation is established when facility is energized.
 - Should this be the same definition applied in the utility’s EIA Form 861M filing?
- B. Definition for “net metering queue participant”.
- A customer for a utility with a queue who has submitted an application but not executed an interconnection agreement
 - Other?
- C. Definition for when a net metering queue participant has not proceeded with their project within a certain amount of time.
- A customer with an executed interconnection agreement that has not yet energized their net metering facility?
 - What type of progress is required to remain in the queue?
 - What amount of time is reasonable for a net metering queue participant to remain in the queue?
 - Other?

We appreciate the effort by the Commission to have standard definitions for tracking purposes.

- A. We support that “net metering participant” be defined as consistent with GAO 2017-2, as suggested in the Commission’s question above.
- B. For “net metering queue participant”, we agree with the Commission’s suggested definition above.
- C. We suggest that the premise in the prompt above be tweaked from losing a spot on the queue to losing status as a net metering participant. We suggest that a customer lose status as a net metering participant if the customer has not yet energized her net metering facility within 1 year of being awarded capacity. During the last year of required net metering offerings pursuant to SEA 309, i.e., beginning July 1, 2021, this time period should shorten to 6 months.
- D. We want to note that we are concerned about the situation where a customer project triggers a utility engineering/feasibility study. There are instances where this study can be delayed on the utility side, and there are also instances where the customer receives the cost estimate coming out of this study for required utility system upgrades to connect the project and the customer ultimately decides to not go through with the project. We want to make sure this is contemplated and that, depending on the situation, the customer either does not lose her place in line or the customer does not cause delay to others just to eventually drop out of the queue. We would respectfully suggest that utilities begin conducting these engineering studies and processing applications before a customer gets to the top of the queue so as to avoid this type of a dispute/issue.

- (3) Net Metering Queue Information Publicly Available when within 1 MW of a Threshold.** Commission staff proposes that a utility should post its net metering participant queue when the available capacity it will make available for any reserved or non-reserved customer-generator type is less than 1 MW. In addition, it appears that the utility has the flexibility to expand the available capacity to any customer-generator type.
- A. What information should be provided for a posted queue? Please provide a working definition for the information suggested.
 - B. How often should the posted queue be updated?

We suggest that the threshold for triggering the net metering queue be higher than 1 MW. Currently, net metering projects are capped at 1 MW (see 170 IAC 4-4.2-1(j)); thus, a single project could eat up the entire remaining capacity in the queue. Instead, we suggest that the net metering queue requirement be triggered at a higher number, perhaps at 20 MW of available capacity remaining.

We suggest that the following information be provided for each project in the queue:

- (1) Project ID to maintain anonymity
- (2) Size
- (3) Resource Type (e.g., solar, wind)
- (4) Customer Rate Class (e.g., residential, commercial)
- (5) When the project's interconnection application is received by the utility
- (6) When the project's interconnection agreement is executed
- (7) When the project is energized

Knowing the size of each project is critical to monitoring the pace by which each utility will meet their caps. Without this information, customers and developers will not have the information they need to know whether they can move forward with business and investment plans. The customer name, developer name, and project name can all be kept anonymous by simply assigning each project a number. We would recommend the Commission and utilities consider the near real-time reporting mechanism that tracks the [MISO Generation Interconnection Queue](#) and the attached presentation of data in the NIPSCO feed-in-tariff lottery results spreadsheet.

We suggest that the posted queue be updated daily or as close to real time as possible.

We also request that customers be made aware that they can call the utility's net metering point person/team to get a more real-time update as to the queue and their place in the queue, as was discussed at the April 10, 2019 meeting.

(4) Designated Contact Person/Group. It appears that the utilities already have designated contact person/group for net metering and that this same person/group would have up-to-date information on net metering availability. Commission staff proposes that the contact information for questions regarding net metering availability be on the utility's website in a conspicuous manner (if not already there) and provided to Commission staff.

We are supportive of this request and ask that customers be made aware that they can use this designated contact person/group to find out more up to date, real-time information than the quarterly reporting on net metering participation discussed above in question 1.

We request that posting "on the utility's website in a conspicuous manner" mean that this designated contact person/group contact information be conspicuously posted to the utility's actual net metering webpage so that the customer does not have any issues finding this information.

We also request some additional basic information be provided to customers, developers, and the general public on the Commission's and the utilities' websites, including a standard, consistent, and clear statement of or table presenting minimum information about customer generation options. It should clearly show which customers and projects have access to what compensation for their customer generation and for how long certain compensation rates are available. For example, customers should understand their option of the rate and certain contract length availability under the Public Utility Regulatory Policies Act (PURPA), if net metering is not preferred or available. Customers should know that their net metering rate will eventually expire, and the replacement rate will either be a forthcoming distributed generation rate that will be determined before the Commission in a proceeding or the rate available under PURPA.

(5) Distributed Generation Definitions. What common definitions would be helpful as utilities move toward filing for distributed generation rates?
[Please note that this question is intended to start a discussion on distributed generation rates and that, once a proceeding regarding distributed generation rates has been filed, the Commission's determination will be based on the evidence presented in that record.]

We respectfully suggest that it is too soon to tell but that additional distributed generation definitions for purposes of future distributed generation rates be addressed within the generic investigation that we suggested on page 1 of this document.

FIT 2 Allocation II - Intermediate Solar Lottery			
Request Form #	Lottery Queue	City	kW
01-IS	15	Goshen	200
02-IS	44	Middlebury	200
03-IS	53	Howe	200
04-IS	10	Howe	200
05-IS	45	Angola	200
06-IS	37	Howe	200
07-IS	20	Oxford	200
08-IS	27	Oxford	200
09-IS	22	Oxford	200
10-IS	16	Oxford	200
11-IS	24	Oxford	200
12-IS	26	Oxford	200
13-IS	11	Oxford	200
14-IS	38	Oxford	200
15-IS	36	Oxford	200
16-IS	7	Oxford	200
17-IS	30	Michigan City	200
18-IS	33	Goshen	42
19-IS	35	Goshen	200
20-IS			
21-IS	17	Goshen	200
22-IS	49	New Paris	200
23-IS	40	New Paris	200
24-IS	29	New Paris	200
25-IS	2	New Paris	200
26-IS	21	New Paris	200
27-IS	8	New Paris	200
28-IS	3	Wolcottville	200
29-IS	41	Brook	200
30-IS	34	Brook	200
31-IS	52	Brook	200
32-IS	14	Brook	200
33-IS			
34-IS			
35-IS	23	Kentland	200
36-IS	18	Kentland	200
37-IS	5	Kentland	200
38-IS	25	Kentland	200
39-IS			

FIT 2 Allocation II - Intermediate Solar Lottery			
Request Form #	Lottery Queue	City	kW
40-IS			
41-IS	55	Goshen	200
42-IS	43	Goshen	200
43-IS	46	Middlebury	200
44-IS	42	Angola	200
45-IS	9	Goshen	200
46-IS	32	Goshen	200
47-IS	1	Goshen	200
48-IS	28	Goshen	200
49-IS	47	Goshen	200
50-IS	19	Goshen	200
51-IS	4	Millersburg	200
52-IS	13	Middlebury	200
53-IS	6	Goshen	200
54-IS	39	Goshen	200
55-IS	31	Goshen	200
56-IS	54	Goshen	200