

June 20, 2019

Ms. Beth Heline  
General Counsel  
Indiana Utility Regulatory Commission  
101 West Washington Street  
Suite 1500 E  
Indianapolis, Indiana 46204

*Submitted via email: [URCComments@urc.IN.gov](mailto:URCComments@urc.IN.gov)*

Dear Ms. Heline:

The Indiana Energy Association, on behalf of our investor-owned electric and natural gas utility members, hereby submit our comments and feedback on the discussion that occurred at the April 10, 2019 Informational Collaborative Meeting regarding Net Metering Availability and Capacity Thresholds.

#### 1) Quarterly Reporting on Net Metering Participation

IURC 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.

***IEA Response: IEA agrees and supports the proposal to provide quarterly reporting to the IURC on the status of net metering participation by our customers. The filing as proposed is reasonable.***

#### 2) Definitions for Queue Management

- A. Definition for "net metering participant" – some possible options include:
- Apply definition consistent with GAO 2017-2.
  - 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?

*IEA Response:* IEA suggests that the IURC consider establishing three (3) different steps to categorize net metering participation as follows:

**Step 1: “Net Metering Queue Participant”:** identifies a customer that has made a complete application and thus been given a position in the queue. This stage is established as the date the application has been received by the utility. At this point the application has been received but has not yet been reviewed and approved by the utility.

**Step 2: “Net Metering Approved Participant”:** identifies a customer that has received approval from the utility and executed the Interconnection Agreement. Step 2 of participation borrows elements of the definition found in GAO 2017-2 (p. 7). A customer is a “participant - under agreement” when both the customer and the utility have signed an interconnection agreement and the utility has received the signed document from the customer.

At this point in the process the onus to move forward with a net metering project is on the customer. The date the interconnection agreement is completed establishes the start date for the time allowed for the customer to retain their position in the queue.

**Step 3: “Net Metering Operating Participant”:** identifies a customer that has installed their system and has an operating (“energized”) system interconnected with the utility.

For purposes of the quarterly and annual reporting to the IURC, IEA suggests that the Step 3 (Net Metering Operating Participant) system status be used to determine which systems are to be included in the report. This step borrows elements from the EIA 861M<sup>1</sup> definition. EIA 861M defines a Net Metering Participant as follows:

“Net Metering participants are customers that are actively enrolled in a net metering program as of the last day of the month.”

For purposes of EIA reporting, IEA has interpreted “actively enrolled” as customers that have a system installed and operating at the end of the month and where a bi-directional meter has been set. Using the EIA definition to identify participants as customers who have operating systems (“Net Metering Operating Participant”) would ensure consistency across reporting by the utility to the IURC, the EIA and other entities.

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?

*IEA Response:* See discussion above. IEA agrees that this label (“Net Metering Queue Participant”) is logical and represents Step 1 in the process of establishing net metering.

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<sup>1</sup> EIA 861 and EIA 861M refers to periodic reporting requirements to the EIA on distributed energy systems installed on a utility’s system.

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?

*IEA Response:* IEA's nomenclature from above would define these customers as at Step 2 – "Net Metering Approved Participant."

Progress towards completion for numerous small net metered projects would be difficult to track. IEA suggests that regardless of progress, all customer be allowed to remain in the queue so long as they complete the project within the time allowed for completion – defined below.

IEA suggests that a reasonable period for a customer to complete an approved project and retain their position in the queue is no more than six (6) months and/or no later than June 30, 2022, except to the extent that the utility determines in its reasonable judgement that good cause exists to extend the period ("good cause extension"). Referring to the project stages described above, the six-month period would begin when the customer becomes a Net Metering Approved Participant. The project must then achieve Net Metering Operating Participant status within six (6) months or it will be removed from the queue, unless the utility grants the good cause extension. This presumes that the available capacity in the queue is fully subscribed.

If the queue is not fully subscribed removal of customers from the queue would not commence until the available capacity is fully subscribed.

If a customer is removed from the queue, the customer may re-apply and re-start the process for approval of the project. Presumably most of the prior interconnection application information will still be valid and should result in an expedited process.

### 3) Net Metering Queue Information Publicly Available when within 1 MW of a Threshold

IURC 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.

**IEA Response:** IEA suggests that a discrete queue be created for each of the three customer-generator types (Residential, Biomass, and Non-Set aside). IEA also requests that the IURC leave to the discretion of each utility whether they choose to expand the available capacity for any given customer-generator type. This includes the movement of available capacity from one generator type to another (available residential capacity to non-set-aside capacity, for example).

The posted queue for each generator type should include the following:

- Unique Customer Identifier
- Application Date
- Approval Date
- Operation Date
- Technology proposed (solar, wind, etc.)
- Interconnection Level
- Capacity of the Proposed Customer System (kW)
- Remaining Available Capacity (kW)

While the queue will only be updated on-line monthly (see discussion of update frequency below), prospective participants will always have the option to call the designated utility representative(s) to get the current (intra month) status of available capacity.

B. How often should the posted queue be updated?

**IEA Response:** IEA suggests that the queue(s) be updated on a monthly basis by the fifth (5<sup>th</sup>) business day of the subsequent month.

While IEA agrees with the consensus that the 1 MW threshold for queue establishment is reasonable, it is conceivable that as a queue is nearing full subscription of available capacity for a given customer-generator type the queue could be filled intra-month between queue postings. However, as described by the participants in the April 10, 2019 workshop -- utility representatives will continue to be responsive to all customer inquiries regarding net metering availability -- including available capacity.

#### 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. IURC 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 IURC staff.

**IEA Response:** IEA agrees with this approach -- that an individual(s) or team within the utility be designated as the contact person(s).

#### 5) Distributed Generation Definitions

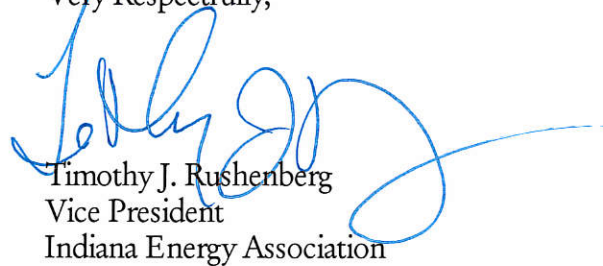
What common definitions would be helpful as utilities move toward filing for distributed generation rates?

***IEA Response:*** IEA offers the following definitions for consideration by the IURC. IEA looks forward to working with the IURC and other stakeholders to further establish the financial and operating parameters for customer owned net metered capacity.

- a) **“Excess distributed generation” (IC 8-1-40-5):** Consistent with the statutory definition, excess distributed generation is the difference between the electricity supplied by an electricity supplier and the electricity supplied back to the electricity supplier by the customer.
  
- b) **“Marginal price of electricity” (IC 8-1-40-6):** IEA suggests that the hourly market price be initially established by the previous calendar year’s Real Time or Day Ahead Average ISO price for the load zone of the electricity supplier.

If you have any questions or comments, please feel free to contact me at (317) 607-7791 or [trushenberg@indianaenergy.org](mailto:trushenberg@indianaenergy.org).

Very Respectfully,



Timothy J. Rushenberg  
Vice President  
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