

## Indianapolis Power & Light Company

### Questions regarding Net Metering Programs (“programs”):

Investor-owned Electric Utilities:

**1) How does your utility presently communicate to potential customers the program’s availability?**

*IPL provides a link on our website indicating the availability of net metering and how to develop and submit an application: [https://www.iplpower.com/My\\_Account/Service\\_Options/Renewable\\_Energy/](https://www.iplpower.com/My_Account/Service_Options/Renewable_Energy/)*

*Further, IPL discusses interconnection and net metering applications with customers individually as needed. The IPL website provides contact information for IPL employees who can provide responses to questions about net metering. For inquiries made to the IPL customer service line, IPL phone agents have been trained to direct customer inquiries to IPL subject matter experts who can then assist the customers with questions. IPL also maintains a dedicated e-mail account ([ipl.interconnection@aes.com](mailto:ipl.interconnection@aes.com)) that is available to customers for net metering related questions.*

**2) Does your utility provide public access to program availability on its website?**

*See answer to question 1 above.*

**3) How, if at all, does your utility inform potential customers of the remaining availability of the program in terms of the statutory capacity thresholds?**

*Outside of public reporting via annually-submitted IURC reports, there has been no formal process established to inform customers of remaining availability. As of December 31, 2018, IPL was at 7.0% of the available capacity for residential customers and 15.5% of the available capacity for business customers, well under the respective statutory capacity thresholds. If IPL’s customers were to have a significant increase in interest regarding participation in net metering, we would consider providing periodic updates to customers on the remaining available capacity.*

**4) If so, how often is the availability updated? (weekly, monthly, etc.)**

*IPL provides reports to the IURC annually, or more frequently as requested. Customer requests for interconnection are tracked internally. On a monthly basis, IPL updates our records of installed customer systems as back-up for monthly reporting to the Energy Information Administration (EIA 861M). While a formal calculation of the remaining net metering availability is not made, the monthly data provides insight into whether the 1.5% threshold is nearing full subscription.*

**5) What, if any, limitations are there to providing public access to the program availability in such a context?**

*IPL is willing to provide customers the status of available net metering capacity on a periodic basis. One limitation would be how often the calculation is required and where the information would be made available. If such a requirement is necessary, IPL suggests semi-annual updates as a reasonable frequency for the status report. This information would be made available on IPL’s website.*

## Indianapolis Power & Light Company

**6) To what extent does your utility facilitate a queue for requests to participate in the program?**

*To date, a formal queue has not been considered necessary given the relatively low level of customer participation. As previously noted, IPL does have an informal internal queue that tracks applications by date received. The informal internal queue is used to track new applications only. To date, available net metering capacity at IPL is at such a level with respect to application volume that it has not been necessary to track with the specificity of queue order.*

**7) If you use a queue, what are the minimum requirements that must be satisfied by an applicant in order to be added to the queue?**

*If a queue was determined to be necessary and appropriate, a logical approach would be to queue customers in the order that applications are deemed to be complete. Applications would be time stamped and logged into the queue in the order received. The applications are then subject to a technical review. The application must include a complete Interconnection Application, fees (as necessary, excludes Level 1), single line diagram, site map, inverter and panel manufacturer specification sheets, and proof of insurance. If there are any deficiencies in the application, these are remedied with the customer and then the application is considered complete. Presumably, the date the application is determined to be complete would establish the position in the queue. A reasonable time to complete installation (i.e. 12 months) after the application is deemed completed would seem appropriate to retain the customer's position in the queue.*

**8) If you use a queue, how is the queue status communicated to the other potential customers?**

*At present, IPL does not use a formal queue. If a queue is determined to be necessary, IPL would propose to maintain this queue on a prominent place on IPL's website.*

**9) What, if any, limitations are there to providing public access to the program queue in such a context?**

*As mentioned, IPL does not utilize a formal queue. However, based on historical experience, limitations exist with respect to customer changes to projects after initial approval by IPL. These late changes suggest that providing accurate information in a public forum could be a challenge. Customers regularly submit initial applications that are approved, which theoretically reserves the capacity with respect to the net metering cap, and then install a system of a different size. Customers opt to install either more or less capacity than originally submitted via application, and then follow up weeks later to inform IPL of the change. Publishing accurate real-time information is made difficult in this context, especially if remaining cap space is small.*

**10) Are there other options your utility has availed itself of to address availability transparency?**

*As noted in the response to question 1 above, IPL makes every effort to be responsive to all customer inquiries regarding net metering, which sometimes include questions regarding availability. With the low level of customer participation to date, IPL has not identified this as a need to be addressed. Given the heightened interest by the Commission and stakeholders on this issue, IPL is willing to*

## Indianapolis Power & Light Company

*prioritize this effort and work to implement identified approaches to increase the amount of transparency around net metering availability.*

**11) Are there other approaches your utility would suggest we explore to address availability transparency?**

*While IPL does not have any concrete approaches to offer at this time, we remain open to suggestions by stakeholders and interested parties on ways to maintain visibility on net metering availability.*

**12) How would your utility suggest customer requests are managed when the availability of net metering to them may be limited because of the statutory reservations?**

*At the present pace of customer adoption, it doesn't appear that the available amount of reserved net metering capacity will be reached prior to the July 1, 2022 date established by Senate Enrolled Act 309. However, at such time it becomes apparent that IPL is approaching the statutory limit (and in no case later than six months prior to July 1, 2022), IPL will make a filing with the Commission to establish a net metering tariff that conforms to the requirements established by SEA 309.*