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April 30, 2021

By Electronic Filing

Mr. Bernard Logan, Clerk
State Corporation Commission
1300 East Main Street
Tyler Building, First Floor
Richmond, VA 23219

RE: Ex. Parte: In the Matter of Establishing Regulations for a Shared Solar Program Pursuant to § 56-594.3 of the Code of Virginia Case No. PUR-2020-00125

Dear Mr. Logan:

Enclosed for filing in the above-referenced proceeding, please find the Comments of the Coalition for Community Solar Access and the Chesapeake Solar & Storage Association.

Please feel free to contact me should you have any questions.

Sincerely,

Eric J. Wallace

CC: Service List

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

Ex Parte: In the Matter of Establishing Regulations for a Shared Solar Program Pursuant to § 56-594.3 of the Code of Virginia	)))	PUR-2020-00125

COMMENTS

On April 14, 2021, the State Corporation Commission ("Commission") issued an Order for Notice and Comment (the "Order") [1] in this proceeding directing interested persons to file, on or before April 30, 2021, comments on the minimum bill proposal submitted by Virginia Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion")[2]. The Order also directed interested persons or entities to file hearing requests on or before April 30, 2021.[3] The Coalition for Community Solar Access ("CCSA") and the Chesapeake Solar & Storage Association ("CHESSA"),[4] appreciate this opportunity to submit comments regarding the minimum bill for Virginia's shared solar program.[5]

I. INTRODUCTION

CCSA's & CHESSA's comments focus on two issues regarding the minimum bill for Virginia's shared solar program in Dominion's service territory:

[1] Order at Ordering Paragraph 3.
[2] PUR-2020-00125, Minimum Bill Proposal of Virginia Electric and Power Company (Mar. 1, 2021) ("Dominion Proposal"). In response to the Commission's Order of March 18, 2021 in this proceeding, Dominion filed supplemental information to its Proposal on April 1, 2021 ("Dominion Supplemental Information Filing").
[3] Order at Ordering Paragraph 3.
[4] CHESSA was formerly known as the Maryland-DC-Virginia-Delaware Solar Energy Industries Association. The comments expressed in this filing represent the position of CHESSA as an organization but may not represent the views of any particular member of CHESSA.
[5] CCSA & CHESSA will file a separate hearing request together with other interested stakeholders.

1) CCSA & CHESSA oppose Dominion's proposed methodology for calculating a minimum bill to be charged to shared solar customers and urge the Commission to reject the Dominion proposal.

2) CCSA & CHESSA recommend a minimum bill of $7.58 per billing month for residential customers, comprised of the Basic Customer Charge (e.g., currently $6.58 per billing month for residential customers) plus $1.00 for the incremental administrative costs identified by Dominion. The minimum bill would be adjusted to reflect the Basic Customer Charge associated with a customer's rate schedule.

These comments will focus on CCSA's & CHESSA's substantive concerns regarding Dominion's minimum bill proposal, as well as explaining CCSA's and CHESSA's minimum bill proposal. CCSA & CHESSA will be filing a separate evidentiary hearing request on or before April 30, 2021.

II. COMMENTS

A. Dominion's Minimum Bill Proposal Should be Rejected.

Dominion's proposal should be rejected because Dominion did not propose a minimum bill rate structure, and certainly not a minimum bill that complies with the requirements of Virginia's shared solar statute, § 56-594.3D of the Code of Virginia:

> The Commission shall establish a minimum bill, which shall include the costs of all utility infrastructure and services used to provide electric service and administrative costs of the shared solar program. The Commission may modify the minimum bill over time. In establishing the minimum bill, the Commission shall (i) consider further costs the Commission deems relevant to ensure subscribing customers pay a fair share of the costs of providing electric services and (ii) minimize the costs shifted to customers not in a shared solar program. Low-income customers shall be exempt from the minimum bill.

1. Dominion's proposal is incomplete and inconsistent with the shared solar statute and public policy for minimum bill design.

Dominion's minimum bill proposal is too vague to be adopted. While Dominion's supplemental filing on April 1, 2021 details cost components to be included in its proposed minimum bill, Dominion did not specify this calculation for each customer class or address potential variation within a class. Dominion's proposal raises, but does not answer, critical questions regarding the minimum bill – would the methodology differ for a commercial customer? Would the minimum bill level change based on the customer's level of consumption, regardless of rate class? CCSA & CHESSA's interpretation of Dominion's proposal is that it does not appear to be for a minimum bill, but rather a minimum "rate" that is a floating amount based on customer usage. At best, it is unclear and should not be adopted as proposed.

To the extent that Dominion is proposing a volumetric minimum bill, such a proposal conflicts with the shared solar statute and is inconsistent with generally accepted minimum bill designs as discussed in analyses by the National Renewable Energy Laboratory ("NREL") and Regulatory Assistance Project ("RAP"). NREL and RAP describe "minimum monthly bills" as mechanisms for ensuring that customers pay a specified minimum amount each month, despite the amount of electricity they purchase from the utility.[6] The definition of a minimum bill provided in Virginia's shared solar statute aligns with NREL and RAP. The shared solar statute

[6] NREL, *Impact of Rate Design Alternatives on Residential Solar Customer Bills: Increased Fixed Charges, Minimum Bills and Demand-Based Rates* (2015), *available at https://www.nrel.gov/docs/fy15osti/64850.pdf*; J. Lazar, *Electric Utility Residential Customer Charges and Minimum Bills: Alternative Approaches for Recovering Basic Distribution Costs, Regulatory Assistance Project* (Nov. 13, 2014), available at: https://www.raponline.org/knowledge-center/electric-utility-residential-customer-charges-and-minimum-bills-alternative-approaches-for-recovering-basic-distribution-costs/.

states that the minimum bill is a "dollar per month amount" (20 VAC 5-340-20), a fixed minimum amount that must be paid each month.[7]

In addition, NREL and RAP describe the minimum bill as an alternative to a "fixed charge," such as the Basic Customer Charge used in Virginia. Such charges, which tend to not vary with usage, include fixed costs of providing electric service, such as metering, billing, and payment processing. As described further below, Dominion goes above and beyond what would be expected of a fixed charge or minimum bill in any other market. Indeed, Dominion's proposal is for a minimum bill that is roughly ten times higher than what the utility currently has in place as a Basic Customer Charge.

Dominion's proposal cannot be adopted when it lacks clarity regarding its basic structure, particularly such fundamental components as the treatment of different customer types and whether the "minimum" is based on a rate which floats with consumption versus a fixed amount held flat month-to-month. Further, the complexity of Dominion's proposal alone conflicts with the basic ratemaking principle that rates should be clear and understandable.[8] Shared solar subscribers will need to understand the program economics to decide whether to subscribe to a shared solar facility. A simple minimum bill will facilitate customer participation while minimizing potential confusion. Clarity regarding the minimum bill will also assist shared solar project owners and financiers trying to evaluate program economics when deciding whether and to what extent to invest in Virginia's clean economy through the shared solar program.

[7] *See also* Dominion Proposal at 2 ("By statute, [the minimum bill] is 'an amount ... that subscribers are required to, at a minimum, pay on their utility bill each month after accounting for any bill credits.") (quoting Va. Code § 56-594.3(A)).

[8] Bonbright et al, *Principles of Public Utility Rates*, at 383 (Pub. Util. Rep. Inc. 1988) (discussing desirable rate attributes, including "practical attributes of simplicity, certainty, convenience of payment, economy in collection, understandability, public acceptability, and feasibility of application").

2. Dominion's minimum bill proposal is excessive and would threaten viability of the shared solar program.

Dominion's example calculation of approximately $75 per month for a typical residential customer (potentially higher when Dominion's customer information platform costs are incorporated) would threaten the viability of Virginia's shared solar program. Moreover, Dominion's proposal is contrary to best practices and policies for minimum bill rate design. Dominion states that a typical 1,000 kWh residential customer would pay about $117 per month for electricity service and supply.[9] This means that Dominion's minimum bill proposal of about $75 per month would be approximately 64% (nearly two thirds) of the typical residential customer's bill.[10] With bill credits applicable to a minority of the bill, subscriber organizations would need to enroll more customers per project and yield less revenue for each customer due to smaller bill credits. Further, individual customer savings would be reduced if not eliminated which, along with limitations on subscription sizing, would hinder customer interest in the program and therefore increase costs associated with marketing and customer acquisition. In turn, these higher costs and risks, couple with an already complex program with ambitious low-income participation requirements would likely render projects non-viable. Community solar projects are multi-million-dollar projects for which the return on investment takes many years of a project's multi-decade useful life. Entities financing these projects must have some assurances that customers will want to stick with the projects and therefore do not back projects that cannot ensure customer savings as those projects are likely to see routine customer turnover.[11]

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[9] Dominion Supplemental Information Filing at 3.
[10] *Id.* at 3-4.
[11] This reality has been played out in California's Enhanced Community Renewables (ECR) program, which has been technically available for over five years and yet has no operating projects due to rate uncertainty and poor economics.

An excessive minimum bill is also out of alignment with best practices in minimum bill rate design. Minimum bills are not widely used in the U.S.,[12] but they have been studied, and in some cases, deemed potentially more effective than "fixed charges," particularly when coupled with other rate design elements. When designed well, a minimum bill can help balance a utility's interest in guaranteeing some level of revenue collection without undermining customer participation in clean energy programs.[13] That said, as with all "fixed charges," a minimum bill requirement carries potential trade-offs. Minimum bills can negatively distort price signals (associated with consumption and efficiency) while also placing a higher burden on low-use customers (who are often low-income customers).[14] While eligible low-income customers are exempt from the shared solar minimum bill, it should nevertheless be set at a level that will allow all customers to participate in the shared solar program, not just high-usage customers. As a result, minimum bills should be designed to support a viable program for all customers, to avoid being regressive and unjustly discriminatory.

Further, a key assumption in determining a successful minimum bill is to not overly burden customers to the point where participation in a clean energy program no longer makes financial sense. As an example, at least in the case of onsite solar net metering, one analysis

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[12] CCSA & CHESSA could not identify another example of a minimum bill (outside of Virginia) being employed in any shared solar program. There are states in which all residential customers pay a minimum bill and there are some states where residential solar customers, with on-site solar, pay a minimum bill.

[13] *See* J. Lazar, *Electric Utility Residential Customer Charges and Minimum Bills: Alternative Approaches for Recovering Basic Distribution Costs* (Nov. 13, 2014), *available at* https://www.raponline.org/knowledge-center/electric-utility-residential-customer-charges-and-minimum-bills-alternative-approaches-for-recovering-basic-distribution-costs/; Energy Central, *The Minimum Bill: A First Step to Fair Utility Rates in a Distributed Energy* Age (Sept. 16, 2014), *available at* https://energycentral.com/c/ec/minimum-bill-first-step-fair-utility-rates-distributed-energy-age; L. Bird et al., NREL, *Impact of Rate Design Alternatives on Residential Solar Customer Bills: Increased Fixed Charges, Minimum Bills and Demand-Based* Rates (Sept. 2015), *available at* https://www.nrel.gov/docs/fy15osti/64850.pdf.

[14] *See generally*, J. Lazar, Electric Utility Residential Customer Charges and Minimum Bills: Alternative Approaches for Recovering Basic Distribution Costs, Regulatory Assistance Project (Nov. 13, 2014), available at: https://www.raponline.org/knowledge-center/electric-utility-residential-customer-charges-and-minimum-bills-alternative-approaches-for-recovering-basic-distribution-costs/.

determined that a reasonable amount for recovering utility costs associated with billing, metering, customer care, and part of the distribution system should amount to no more than $15-$20/month.[15] The NREL analysis also highlights the importance of balancing reasonable cost recovery for utilities without undermining the economics for customers in clean energy programs. These studies are also consistent with a recent decision for residential rooftop solar customers in South Carolina, where the Public Service Commission adopted a $13.50 minimum bill, inclusive of the "Basic Facilities Charge," for residential solar customers within Dominion's South Carolina service territory.[16]

Dominion's proposed minimum bill is excessive and will not "afford customers of a Phase II Utility the opportunity to participate in shared solar projects,"[17] nor will it "allow all customer classes to participate in the program."[18] Indeed, Dominion's proposal will not allow any customer classes to participate in the program because the program will not be economically viable for developers or customer subscribers.

If an excessive minimum bill renders Virginia's program non-viable, and developers instead invest in other markets outside of Virginia, Virginians will lose out on the benefits of shared solar program and the growth of Virginia's clean energy economy. Such a loss would obviate complementary benefits such as: faster reduction in pollution, economic development, and a more resilient electricity grid. In sum, if Dominion's minimum bill proposal is adopted, it will not "reasonably allow for the creation of shared solar facilities."[19]

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[15] J. Kennerly, *The Minimum Bill: A First Step to Fair Utility Rates in a Distributed Energy Age* (2014) *available at* https://energycentral.com/c/ec/minimum-bill-first-step-fair-utility-rates-distributed-energy-age.
[16] South Carolina Public Service Commission, April 28, 2021 Directive (Docket No. 2020-229-E), https://dms.psc.sc.gov/Attachments/Matter/b2e7c059-6429-41ed-a346-0e07caf88078.
[17] Va. Code § 56-594.3(B).
[18] § 56-594.3(F)(2).
[19] § 56-594.3(F)(1).

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3. Dominion's proposal is overbroad and fails to adequately minimize cost shifting.

Dominion's proposal is overbroad, going beyond the incremental costs (electric service and administrative) of the shared solar program.[20] It is not consistent with the requirement that "such costs must reflect incremental costs of the shared solar program and not otherwise recovered by the utility from participating subscribers."[21] The additional costs identified by Dominion are not "relevant to ensure subscribing customers pay a fair share of the costs of providing electric services."[22] The Basic Customer Charge recovers the customer's cost to connect to the system and is not changed for shared solar program subscribers under CCSA's & CHESSA's proposal below. The costs of connecting the shared solar generator are recovered from the generator itself.

CCSA & CHESSA agree that demonstrated incremental administrative costs—such as the $1 per month for customer service staff—are reasonably added to the minimum bill. Still, a huge difference remains between CCSA's & CHESSA's proposal and Dominion's proposal—more than $65 in additional monthly charges that Dominion seeks to impose through the minimum bill. This difference seems to be entirely calculated by Dominion as the sum of the charges a hypothetical customer might have paid, net of avoided energy costs, if the customer had received no bill credit. Of course, Dominion's payment of a bill credit to a shared solar subscriber creates no incremental cost to the utility because those costs are recovered through the fuel factor. Fuel factor recovery creates no demonstrated incremental cost to other customers because all that Dominion has done is calculate its minimum bill proposal (net of energy value) based on what would have been recovered from shared solar customers that do not earn bill

[20] Va. Code § 56-594.3(D); 20 VAC 5-340-80(A)(1).
[21] 20 VAC 5-340-80(2).
[22] Va. Code § 56-594.3(D); 20 VAC 5-340-80(A)(1).

credits—Dominion has not shown that shared solar subscribers create $75 in monthly charges as costs, nor that charging that amount is required for fair allocation of costs in light of the fact that shared solar customers are supporting the addition of clean solar generation in the Commonwealth. As noted above, the literature on minimum bills highlights that they are intended to cover fixed costs related to serving a customer and are typically used as an alternative to a fixed monthly basic customer charge.

The shared solar statute reflects these principles by narrowly delineating the costs that must be included in the minimum bill to "the costs of all utility infrastructure and services used to provide electric service and administrative costs of the shared solar program."[23] Because utility infrastructure and services costs associated with the operation of the shared solar generator are recovered through up front and ongoing interconnection costs assessed on shared solar facilities, the only remaining administrative costs of the shared solar program that must be reflected in the minimum bill are the costs incurred by Dominion for apportioning, crediting, and billing shared solar subscribers.[24]

CCSA & CHESSA maintain that the Commission should focus on the direct and incremental costs and benefits of shared solar operations and billing integration. Fairness can only be fully assessed through a comprehensive, transparent, objective, and forward-looking assessment of the costs and benefits of shared solar operations.

With regard to minimizing cost shifts, incremental and ongoing generation facility costs are captured in interconnection charges, which are paid by the Subscriber Organizations. The minimum bill should be limited to the non-facility-related costs of program administration. Shared solar customers are subscribing to shared solar facilities to benefit from the bill credits

[23] Va. Code § 56-594.3(D).
[24] CCSA & MDV-SEIA Comments and Hearing Request at 40-44 (Nov. 2, 2020).

associated with the facility's output and to help accelerate the development of renewable generation for Virginia's clean energy economy.

Importantly, Dominion's proposal is unclear about how it would minimize costs shifted to customers not participating in the shared solar program.[25] Perhaps Dominion would use the revenues from the minimum bill to reduce the amount recovered for the bill credits through the fuel factor pursuant to 20 VAC 5-340-60(F)(6). Additional clarity regarding the application of revenues from the minimum bill is necessary. Moreover, the Commission should consider ways in which Dominion can contribute to identifying and minimizing any net costs of the program borne by non-participants. Such measures include: (1) a full benefit-cost analysis; (2) the identification of locational value to inform siting and development of shared solar facilities; (3) more transparent and forward-looking integrated resource planning; (4) including distribution resource planning; (5) more effective delivery of energy efficiency and demand response programs for shared solar customers; and others. Dominion's proposal does not evidence any effort by the utility to "minimize the costs shifted to customers not in a shared solar program,"[26] such as through the identification of location value and capacity relief value in the distribution system.

Dominion's avoided cost credit is not based on a comprehensive, transparent, objective, and forward-looking assessment of all the costs and benefits of shared solar facility operation and customer participation. The Dominion calculation does not appear to account for locational benefits, or for other benefits associated with increased solar generation in Virginia. As a result, Dominion has not demonstrated that its avoided cost credit is just and reasonable.

[25] Va. Code § 56-594.3(D); *see* Dominion Proposal at 2-3.
[26] § 56-594.3(D); 20 VAC 5-340-80(A)(1).

B. CCSA's & CHESSA's Minimum Bill Recommendation

CCSA & CHESSA maintain their position regarding the minimum bill as detailed in the comments submitted in this proceeding on November 2, 2020.[27] The minimum bill for the shared solar program should:

1. Avoid confusion and frustration among shared solar customers. Shared solar customers should not be required to pay costs unrelated to the shared solar program. An access bill designed to collect rents from customers at nearly the same level as a non-participation bill will frustrate and confuse customers that invest private dollars in supporting new solar energy development in the Commonwealth; and
2. Provide predictable and reasonable calculation of the minimum bill costs. Once set at a reasonable level reflecting only incremental costs associated with shared solar program implementation and operations, the minimum bill should be kept consistent, protecting customers from frequent changes and supporting overall program financeability.

Dominion's estimate of approximately $302,300 in incremental administrative costs appears reasonable for a fully subscribed shared solar program.[28] When spread across the estimated output of 200 MW of solar generation,[29] this cost will result in a minimum bill amount of about $1 per customer per month for shared solar subscribers.[30] In future years, when Dominion can demonstrate and reasonably allocate actual incremental billing system costs

[27] *See* CCSA & MDV-SEIA Comments and Hearing Request at 11 (Nov. 2, 2020).
[28] Dominion Supplemental Information Filing at 7.
[29] Va. Code § 56-594.3(E).
[30] Calculated as 200 MW x 8,760 hours x 19% capacity factor = 332,880 MWh. Assuming the "representative" Dominion customer uses 1 MWh per month, and that the Dominion administrative costs are about $302,300, a minimum bill of $0.91, or about $1.00 per customer month, would be justified.

associated with serving shared solar customers, Dominion should be permitted to request that such costs be included in the minimum bill.

In addition to the $1 monthly administrative component, CCSA & CHESSA propose that shared solar customers continue to pay the Basic Customer Charge associated with their rate schedule. For example, the current Basic Customer Charge for the "Basic Residential Rate" is $6.58 per billing month.[31] This rate can vary significantly depending on the specific schedule utilized by the customer, particularly for commercial customers with Basic Customer Charges in the range of $10-$15/month for small general service customers, $19-$25/month for intermediate (medium-sized) customers, and between $112-$120/month for large general service customers.[32] The Basic Customer Charge ensures recovery of the basic costs of connection that do not vary with the level of the customers usage, and so, like a minimum bill, should not be reduced or eliminated by shared solar credits.

Together with the $1 per billing month charge for incremental shared solar costs, the effective minimum monthly charges for residential shared solar subscribers would be $7.58 per customer month, adjusted for other rate classes to reflect the applicable Basic Customer Charge. This approach would avoid potentially regressive impacts and provide simplicity and understandability in the minimum bill design. Shared solar customers would continue to pay their Basic Customer Charge because they remain customers of the utility, and they would pay the added administrative costs of also participating in the shared solar program. Because the Basic Customer Charge is established through existing Commission ratemaking procedures

[31] Dominion Tariff, Rate Schedule 1 – Basic Residential Rate, *available at* https://www.dominionenergy.com/virginia/rates-and-tariffs/residential-rates.
[32] *See* Dominion Tariff, Business Rates, *available at* https://www.dominionenergy.com/virginia/rates-and-tariffs.

based on fixed costs of providing electric service, it provides an administratively efficient foundation for the minimum bill and does not require a separate evaluation of such costs.

III. CONCLUSION

For the reasons explained above, CCSA & CHESSA request that the Commission reject Dominion's minimum bill proposal and instead adopt CCSA's and CHESSA's minimum bill proposal for the shared solar program of $7.58 per billing month (for residential customers), comprised of a $1 charge associated with administrative costs of the program plus the applicable Basic Customer Charge. CCSA & CHESSA also support parties' requests for an evidentiary hearing regarding the minimum bill, as requested during this proceeding last year and also in the separate hearing request to be submitted by CCSA, CHESSA, and other interested solar stakeholder parties.

Respectfully submitted,

COALITION FOR COMMUNITY SOLAR ACCESS

and

CHESAPEAKE SOLAR & STORAGE ASSOCIATION

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Dated: April 30, 2021

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Comments of the Coalition for Community Solar Access and the Chesapeake Solar & Storage Association was served, by electronic mail, this 30th day of April, 2021 upon the following:

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