

Arcadia

22 February 2022

TO: Chair Wilson, Vice Chair Crosby, and esteemed members of the Maryland House of Delegates

Re: Arcadia support for HB818 with a clarifying amendment

Esteemed members of the Economic Matters Committee, thank you for the opportunity to testify on HB818.

This important legislation allows Maryland Community Solar Pilot Program subscriber organizations to elect to have the utility hosting their project collect the subscription fees from subscribers and remit those charges to the subscriber organization. This is an improvement that increases program efficiency and makes it easier to enroll low income customers.

Below is an introduction to Arcadia and an overview of our support for this legislation with amendment.

Arcadia overview

Arcadia is building the software that's necessary for Marylanders to realize the full benefits of clean energy. Today, customers face a bewildering assortment of energy technologies (ranging from energy efficiency and renewable energy to battery storage and electric vehicles), all of which have unique capabilities, costs, and user experiences. Arcadia's software makes it possible for energy technology providers to delight their customers and move clean energy forward by enabling simple user experiences that will save people money. The first industry served with Arcadia's software is community solar, where Arcadia manages subscribers across more than 500 MW nationwide, making it the largest manager of residential community solar subscribers in the country.

Support for utility consolidated billing

The optimal form of utility consolidated billing is commonly referred to as net crediting. The net crediting model of consolidated billing would split the bill credits between the Subscriber Organization and subscribers, with a portion of the subscriber organization's credit retained by the utility to recover the costs associated with this new process.

Net crediting has a number of benefits for project subscribers and the broader program. Most notably, it makes it easier to enroll low income customers. In addition, net crediting eliminates the need for customers to receive two bills (one being the standard utility bill and the other for their community solar subscription) and reduces the risk for subscriber organizations, who receive subscription payments directly from the utility, as opposed to from the subscriber.

Utility consolidated billing is active in New York

New York's net crediting program launched last year and is largely considered a success. Other states, including New Jersey and Massachusetts, are actively considering adopting utility

consolidated billing and net crediting requirements as a way to increase low income participation

Clarifying amendment

We respectfully offer this clarifying amendment to provide the Public Service Commission specificity as it promulgates regulations to act on HB818 laid out in **red**. This specifically lays out what is meant by utility consolidated billing.

A subscriber organization may, in conjunction with the electric company serving the territory of the community solar energy generating system, participate in utility consolidated billing provided by the electric company-, **where the utility includes the monthly CSEGS subscription charge to the utility bill of CSEGS members and would remit payment received for those charges to the subscriber organization.**

Conclusion

Arcadia is grateful for the opportunity to comment on this matter. Please contact Arcadia at James.Feinstein@arcadia.com or 202 999 8916 if you would like to discuss this further.

Sincerely,



James Feinstein
Senior Policy Manager
Arcadia