



Re: SB0079 Electricity Change of Address – Maintenance of Subscriptions and Contracts
Senate Finance Committee

February 2, 2021

Position: Favorable

BILL OVERVIEW - SB0079 ensures continuity in community solar contracts when a community solar subscriber moves their account to a new address within the same utility service territory.

ForeFront Power supports SB0079 because it provides continuity of consumer enrollment in community solar projects, consistent with existing regulation requiring community solar providers to provide such portability (see COMAR 20.62.05.09 F : “Share Transfers and Portability... A subscriber that moves to a premise located within the service territory served by the CSEGS may change the premises to which the CSEGS electricity generation shall be attributed to the new premise, and a subscriber organization may not charge an unreasonable transfer fee to such a customer.”).

The proposed bill aligns electric utility company operations with both community solar provider intent and existing regulatory requirements (see above), which reduces on-going combined administrative burden across consumer subscribers, community solar developers, and utilities relative to the status quo of re-enrolling subscribers upon a change to subscriber utility service address. Reducing the administrative burden simplifies the consumer experience, reduces subscriber churn and attrition, and provides continuity in revenue to realize payback of significant private sector capital investments in community solar project infrastructure. A subscriber move should be as easy as a change of address for any other household bills, including those for cell phone and cable television service, or subscriptions, like magazines or newspapers.

Sincerely,

Bryan Eckstein
Vice President, Project Finance and Business Development