



Before the General Assembly of the State of Maryland

Economic Matters Committee

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Testimony of Leslie Ann Elder
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HB818: "Electricity - Community Solar Energy Generating Systems - Consolidated Billing"
FAVORABLE

Thank you for the opportunity to provide testimony on Community Solar Energy Generating Systems (CSEGS) Consolidated Billing. The Coalition for Community Solar Access (CCSA) submits testimony in strong support of Delegate Clippinger's HB818.

CCSA is a national coalition of businesses and nonprofits working together to implement best practices for all community solar markets. Our mission is to empower all Maryland households and businesses that seek home grown energy sources through community solar. We work with customers, utilities, local stakeholders, allies and policymakers to develop and implement best practices that ensure community solar programs provide a win-win-win solution. Our members are solar industry leaders and are engaged at every step of development, ensuring these best practices are not theoretical but are applied and practiced. We represent over 80 member companies, some who are headquartered in Maryland and others who are investing here.

CCSA and our members are active participants in the community solar pilot program (CSEGs) and are thankful for the opportunity to use the few remaining years of the pilot program to test out solutions to achieve the policy objectives of the state and local jurisdictions. HB818 proposes to make participation in Community Solar easier by allowing for a one electric bill, with a net credit, for the utility's electric customers who purchase all or a portion of their electric supply from a subscriber organization .

CCSA is supportive of implementing utility consolidated billing (UCB) as an option for Community Solar Subscriber Organizations. Specifically, we are supportive of implementing the option for net crediting for community solar to enhance participation and decrease market risks. If implemented properly with a reasonable fee structure and in a transparent, easy-to understand customer interface, net crediting can provide direct benefits to New Jersey community solar customers—including low- to moderate-income (“LMI”) subscribers---and help Maryland achieve its clean energy and equity goals by enabling greater access to community solar development at lower cost.

Across the nation, billing systems have been frequently cited as an impediment to increasing participation in community solar programs. An option for consolidated billing would remove billing and collection barriers to community solar, particularly for LMI subscribers. Under this proposal, the utility would manage the allocation of credits to customers and developers and remove the need of a community solar customer receiving two bills from a subscriber organization and the utility. Instead,



community solar subscribers can receive a Community Solar Savings Rate on their utility bill. In other states, utility consolidated billing with net crediting is structured so that the utility will allocate a net credit to the subscriber and the remaining credit to the Subscriber Organization, minus a utility administration fee of no more than 1%. The customer experience is dramatically simplified, enabling the Subscriber Organization to serve more households without the need to collect sensitive payment information. Under a net crediting program, the subscriber only receives a credit on their bill without having to worry about additional fees.

Utility consolidated billing policy goals should include:

- Reduce project costs
- Increase participant benefits
- Promote clarity and simplicity for customers
- Meet clean energy goals

Under this mechanism, rather than receiving two bills from the community solar organization and the utility, respectively, community solar subscribers can instead receive a Community Solar Savings Rate on their utility bill. The utility allocates a monetary payment, known as the Sponsor Payment, to community solar organizations, reflecting the remaining credit of the project.

CCSA recommends taking best practices and lessons learned from other markets, such as New York. Through our members direct experience in the New York net crediting system and others, CCSA recommends making this critical change to increase participation.

Delegate Clippinger's HB818 is simple and allows for a more effective way to serve community solar customers and especially those who need to lower their energy burdens the most. Thank you for your time and consideration for HB440 and CCSA hopes we can count on your support.

Respectfully,

Leslie Ann Elder, Mid-Atlantic Director
Coalition for Community Solar Access