February 13, 2026

Via Electronic Mail

Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

RE: RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR PROJECTS
(UD-18-03)

Dear Clerk,

Please find the attached Direct Testimony of Georgina Arreola-Lennox on Behalf of the Alliance for Affordable Energy, Together New Orleans, and SunConnect Corporation, along with affidavit and exhibits, for filing under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: A RULEMAKING PROCEEDING	**)**	
TO ESTABLISH RULES FOR	**)**	**DOCKET NO.UD-18-03**
COMMUNITY SOLAR PROJECTS	**)**	

DIRECT TESTIMONY

OF

GEORGINA ARREOLA-LENNOX

ON BEHALF OF

THE ALLIANCE FOR AFFORDABLE ENERGY,

TOGETHER NEW ORLEANS AND

SUNCONNECT CORPORATION

FEBRUARY 13, 2026

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EXHIBITS

I. INTRODUCTION

Q1: PLEASE STATE YOUR NAME, AFFILIATION, AND BUSINESS ADDRESS.

A: My name is Georgina Arreola-Lennox. My business address is 3305 Washington St, #201, Boston, Massachusetts 02130. I am an independent clean energy policy and strategy consultant and clean energy advocate. In my capacity as a consultant, I advise clean energy companies, developers, and mission-driven organizations on regulatory strategy, program design, and policy frameworks that support clean energy deployment, align business objectives, promote economic justice for underserved communities, and meet climate goals. My primary areas of focus are regulatory, implementation, and evaluation issues.

Q2. ON WHOSE BEHALF ARE YOU TESTIFYING:

A: I am submitting direct testimony to the Council of the City of New Orleans (the "Council") on behalf of the Alliance for Affordable Energy, Together New Orleans, and SunConnect Corporation, intervenors in UD-18-03.

Q3: PLEASE DESCRIBE YOUR EXPERIENCE IN THE ENERGY SECTOR, YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS IN THIS FIELD.

A: I hold a Bachelor's in Management Science from UC San Diego and a Master's in Public Policy from Georgetown University, with a concentration in policy analysis and quantitative evaluation. I have over 15 years of experience in clean energy program design, implementation, and customer impact, including more than seven years specifically in the community solar sector.

For eight years, I worked at a national nonprofit that designed and administered large-scale clean energy programs for states and other municipalities. In that role, I supported program design and evaluation, including measuring program impacts and outcomes, and identifying barriers to adoption.

In 2018, I joined a community solar developer where I managed operational functions directly related to customer subscriptions, billing workflows, and utility coordination. During this period, I worked in markets such as Massachusetts and Minnesota, where community solar was primarily administered through dual billing, and I gained direct experience with the customer confusion and reconciliation challenges that the system creates.

Following New York's adoption of utility consolidated billing (UCB) for community solar (i.e. net crediting) in 2019, I participated in stakeholder processes supporting program development and implementation. I later served as Vice President of Operations, overseeing the full customer journey and project performance, including subscriber enrollment, customer support, billing, and asset management.

The servicing arm of that business became an independent company under Perch Energy in 2021, and I continued to lead operations while serving as a primary regulatory and policy liaison. In 2022, I became Vice President of Policy, supporting expansion into additional markets, including Maine, New Jersey, Maryland, Washington, DC, and Illinois, many of which included low- and moderate-income customer requirements. My policy work has focused on improving customer access, customer protection, and the reliability of savings, particularly through consolidated billing, specifically via net crediting, and championing related measures that reduce barriers to participation.

I have participated in consolidated billing-related advocacy, regulatory proceedings, and implementation efforts in multiple states, including New York, New Jersey, Maryland, Illinois, Minnesota, and New Mexico, collaborating with state regulatory bodies, utilities, and other key stakeholders. I have also worked with national partners, including the U.S. Department of Energy, the Coalition for Community Solar Access, and the National Renewable Energy Laboratory (NREL), to evaluate community solar billing mechanisms and identify best practices.

In summary, my testimony reflects both policy expertise and hands-on operational experience administering community solar subscriptions, including direct experience with billing systems, customer education, and customer protection considerations. A copy of my CV is attached as Exhibit A.

Q4: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A: The purpose of this testimony is to provide clarity about whether consolidated billing is in the public interest and the various methodologies that can be used to implement it, including net crediting. I will explain how traditional billing for community solar works, why it has been a hurdle for customer participation and retention, and how net crediting addresses these shortcomings. I will also outline the benefits of net crediting for consumers, non-participants, key stakeholders, and markets as a whole, and why it serves in the public interest, in order to inform the Council's assessment of whether to include consolidated billing in the New Orleans community solar program.

II. SUMMARY CONCLUSIONS

Q5: WHAT ARE YOUR SUMMARY CONCLUSIONS?

A: Consolidated billing for community solar implemented as net crediting is in the public interest, and why the Council should approve UCB for community solar using the net crediting framework. Drawing on operational experience and established practice in mature community solar markets, it is clear that dual billing creates customer confusion, delayed savings and cash-flow problems, issues that undermine customer participation and retention, particularly for low and moderate-income households. Net crediting, however, is a **consumer protection measure** that directly addresses these concerns by delivering guaranteed savings clearly and

consistently on the utility bill, without requiring the utility to collect third-party charges and assume new financial risk.

Net crediting is a settlement and accounting mechanism and not a third-party charge. It therefore decreases utility receivables and collections risk, contrary to numerous concerns raised by ENO's witnesses. The arguments against UCB for community solar rely on alternative methods for implementing UCB that the intervenors in this docket have not contemplated or proposed. Additionally, net crediting is essential to achieving equitable access, protecting customers, and supporting the development of an attractive, scalable community solar market.

Net crediting provides key benefits, including:

- Clear, predictable, and reliable customer savings reflected directly on the utility bill
- Strong customer protection through guaranteed savings
- Reduced billing confusion and a decrease in customer complaints compared to dual billing
- Compatibility with energy assistance, payment plans, and utility discounts
- Lower utility receivables and reduced collections risks
- Greater revenue certainty for projects, supporting long-term market stability and investment attractiveness

Therefore, I urge the Council to forge ahead and require ENO to comply with the Council's order to implement UCB through net-crediting for the New Orleans Community Solar Program.

III. UTILITY CONSOLIDATED BILLING AND FRAMEWORKS FOR IMPLEMENTATION

Q6. WHAT IS UTILITY CONSOLIDATED BILLING?

A: Utility consolidated billing is a billing arrangement that allows a customer to receive a single bill from their utility that includes delivery and supply charges from the utility and/or third-party providers on a single bill.

The term UCB is an umbrella term for a billing arrangement that keeps the utility as the primary billing entity and helps to simplify the customer experience. In open energy markets, it can be used when customers enter into a contract with a third party other than their electric utility to supply their energy, for example, to contract for energy from a particular generation source, such as 100% renewable energy. But UCB has applications beyond competitive energy sales, like community solar, and multiple frameworks can be used to implement it.

Q7. WHAT ARE DIFFERENT WAYS OF IMPLEMENTING UCB?

A: Rules vary state to state, but generally, utilities providing UCB for third-party retail energy must either purchase the receivables of the supplier (POR) or prorate customer payments

between the utility and the supplier, and based on regulatory direction, the utility may implement either methodology. If the utility utilizes POR, the utility must pay the supplier before the customer pays for their usage, so to account for any potential non-payment, the supplier payment is discounted. If the utility prorates customer payments, then the supplier is only paid once a customer makes a payment to the utility, but the customer payments are prorated between the two parties, and the utility has an obligation to attempt to collect the supply charges, often for up to 90 days.

What is important to note is that UCB can be implemented in multiple ways. Net crediting is one option for implementing UCB, and it is the best billing mechanism to establish inclusive community solar programs.[1]

Q8: HOW IS COMMUNITY SOLAR DIFFERENT FROM THIRD-PARTY ENERGY SUPPLY?

A: Under community solar, the customer's relationship with their electric utility remains unchanged, and the customer will continue to receive their energy supply from their electric utility. A community solar subscriber enters into a contract to receive **community solar bill credits at a discounted rate.** Community solar providers do not sell energy. In fact, in open energy markets, a customer may elect to contract with a third party for energy supply and enroll in community solar simultaneously.

The energy generated from a community solar farm is directly injected into the utility's electric grid, and the compensation is provided in the form of bill credits, which must be placed on a customer's electric bill first, to ensure they retain at least a portion of the total value. In other words, a community solar subscription sells energy discounts, not energy. While a retail energy customer may purchase green energy and say they are buying clean energy, "subscribing customers can claim that they are supporting solar development, but they are not actually using any more renewable energy than a typical customer."[2]

As such, unlike a customer on retail energy, a community solar subscriber can never pay more for a bill credit than the credit is worth, and most community solar markets have minimum savings requirements requiring 5, 10, or up to 20% savings that vary by customer type and often provide higher discounts for low and moderate-income subscribers.

IV. BILLING AND CREDITING FOR COMMUNITY SOLAR: DUAL BILLING VS. UCB FOR COMMUNITY SOLAR AND THE NET CREDITING FRAMEWORK

Q9: HOW DOES DUAL BILLING FOR COMMUNITY SOLAR WORK?

[1] Mr. Wemple argues that net crediting is not a community solar program design best practice; however it is recommended by NREL, CCSA and numerous other key stakeholders as a way to develop inclusive community solar programs that enable participation of low-and-moderate-income customers.

[2] Xcel Energy. Community Solar Gardens - Community Subscriber FAQ. https://www.xcelenergy.com/staticfiles/xe-responsive/Environment/Renewable%20Energy/Solar%20Rewards%20Community%20Subscriber%20FAQ.pdf

A: Early community solar markets, such as those in Minnesota and Massachusetts, were built on a dual billing structure. Under dual billing, subscribers receive community solar bill credits on their utility bills proportional to their share of project generation. These credits are applied against the customer's total utility charges, resulting in a reduced, and sometimes fully offset, payment to the utility. The subscriber organization (or the project owner's administrator) separately invoices the customer for the previously received bill credits, less the customer discount agreed to in the customer contract. This second bill usually arrives two to three months after the customer sees the bills applied against their utility bill. As a result, the customer receives **two separate bills** tied to the same month of energy usage, one from the utility and one from the subscriber organization.

This structure creates several predictable challenges:

1. **Timing lag and confusion.**
   There is often a delay between when energy is generated, when credits are calculated, when credits appear on the utility bill, and when the subscriber organization invoices the customer. In practice, customers may not see the full "credit + invoice" picture for a given month until 60 to 90 days later. This makes it difficult for customers to understand whether they are saving money and what they owe in total.
2. **Difficulty reconciling total costs.**
   Because the utility credit reduces the utility bill while the subscription invoice is separate, customers must manually reconcile two bills to determine net savings. This is especially challenging for customers who are already managing tight household budgets.
3. **Mismatch between credit application and invoicing.**
   In months where credits exceed what is owed to the utility, the unused portion of the credit may roll over to a future month. However, customers may still receive an invoice from the subscriber organization tied to the full credit allocation for that period. This mismatch can create situations where a customer's cash flow is worse in a given month than it would have been without community solar, even though the customer is still expected to benefit over time.

These issues are not theoretical. In my operational experience, billing and timing confusion under dual billing is one of the most common drivers of customer complaints, customer service calls, and cancellations, especially when customers experience utility delays in credit allocation or utility billing. Additionally, dual billing often requires customers to enroll in auto-pay. This dynamic can be especially harmful for fixed-income and low- and moderate-income households, where predictability and clarity are essential for participation, and for whom these requirements are hurdles for participation, highlighting a need for mechanisms that streamline the billing and payment process and make it more accessible for all customers.

Q10: WHAT IS NET CREDITING AND HOW DOES IT WORK?

A: The term "net crediting" was coined by National Grid (Niagara Mohawk) in the company's petition to the PSC to implement a CDG program intended **to reduce market barriers that had**

impeded the development of CDG *"including the need under the current program structure for multiple bills and the credit risk faced by CDG sponsors required to contract directly with satellites for subscription fee payments".*[3] This is significant, because it demonstrates that a utility identified the dual billing framework as an impediment to development of community solar in New York and even argued the risks faced by project owners were the result of a poor program framework that could be resolved without additional risk to the utility[4].

In 2019, the New York Public Service Commission approved UCB for community distributed generation projects and approved the implementation using the **net crediting methodology.** Net crediting is a billing framework that facilitates the customer experience by applying customer savings from a community solar subscription directly on the utility bill without requiring a separate subscription invoice to the customer.

Under net crediting, the value of the community solar credit is allocated into components, including:

- **Customer savings**, based on an agreed-upon discount rate (for example, 20% minimum savings for low- and moderate-income customers and 10% for other subscribers, as contemplated in the New Orleans proposal).
- **A utility administrative fee**, typically a small percentage to cover utility processing and implementation costs[5].
- **The net credit remitted to the project owner** represents the remaining portion of the credit value after customer savings and the utility administrative fee are accounted for.

The key point is that net crediting is an **accounting and settlement mechanism**, not a new utility "collection" function. Customers receive the benefit directly on their utility bill, and the project owner receives the remaining value through settlement, without requiring a separate customer invoice.

Q11: DOES NET CREDITING DIFFER FROM WHAT ENO'S EXPERTS HAVE DESCRIBED?

A: **Yes**. The Intervenors have made clear that they support the approval and implementation of **net crediting**, the utility consolidated framework pioneered by New York's Community Distributed Generation (CDG) program. This program is materially different from the model described by ENO's experts.

[3] Case 19-M-0463. In the Matter of Consolidated Billing for Distributed Energy Resources. Order Regarding Consolidated Billing for Community Distributed Generation. (State of New York Public Service Comission.December 12, 2019).

[4] Niagara Mohawk's petition was supported by the Joint Utilities, including ConEdison where Mr. Wemple led regulatory affairs and worked through 2023.

[5] The utility administrative fee was set to 1% of the value of bill credits, the utilities may petition the commission to increase the admin fee if they can reasonably justify any increases, to date no petitions have been filed. With the exception of Illinois which charges a 2% admin fee, all major community solar markets that offer net crediting charge a 1% utility admin fee.

By contrast, ENO's witness testimony appears to conflate net crediting with UCB with prorated customer payments, a model sometimes used in retail energy supply, where the utility places third-party charges on the customer bill and collects those charges on behalf of the third party. **That is not what the Intervenors have proposed in this proceeding and they oppose this alternate mechanism.** UCB with prorated customer payments has been rejected in favor of net crediting in other community solar markets[6].

Under the net crediting framework supported by the parties:

- The customer receives savings directly on the utility bill,
- The utility retains a modest administrative fee, and
- The remaining bill credit value is remitted to the SO or project owner through settlement.

This structure does **not** change the supplier relationship between the customer and ENO and therefore does not require the utility to create new collection processes for subscription fees, nor does it require ENO to pursue collections or disconnection for unregulated third-party charges. As a result, it is materially different from utility consolidated billing models that rely on the utility collecting third-party supply charges from customers or UCB with prorated customer payments.

This distinction is important because many of the concerns raised by ENO's experts, such as increased collections burden, nonpayment risk, and customer arrearages, are tied to UCB with prorated payments, **a model that is not being proposed here**. Net crediting avoids those concerns by design, because the project owner's compensation is withheld from the bill credit value rather than billed to the customer as a new charge.

Notably, ENO's own witness, Ms. Lejeune, acknowledges that the SO's compensation comes from the bill credit and is not a new customer charge:

> "Under this arrangement, the Subscriber Organization is compensated by receiving a portion of the value of the Subscriber's bill credit, which the utility withholds and remits directly to the Subscriber Organization"[7]

However, that same testimony then describes the arrangement as if "the utility's billing system is used to collect payment for a third-party's generation services"[8], relying on Mr. Wemples description. That characterization is inconsistent with how net crediting operates and the proposal before the Council.

For the avoidance of confusion, net crediting is also not equivalent to POR as ENO and its experts have described. POR is also not appropriate or necessary, as both New York and

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[6] Administrative Docket RM 56. Revisions to COMAR 26.62 Community Solar Energy Generation Systems. Order No. 91524: Order on Consolidated Billing For the Maryland Community Solar Program. (Public Service Comission of Maryland, February 10, 2025).

[7] CNO Docket No UD-19-03. Rulemaking Proceeding to Establish Rules for Community Solar Projects. ENO's witness testimony filed January 16, 2026. New Orleans City Council.

[8] CNO Docket No UD-19-03. Rulemaking Proceeding to Establish Rules for Community Solar Projects. ENO's witness testimony filed January 16, 2026. New Orleans City Council.

Maryland have asserted. As the New York Commission explained: "The use of the net crediting model would eliminate the need for a POR method for subscription fees, since subscription fees would be withheld automatically from bill credits and paid directly to the CDG Sponsor. This will reduce cost, complexity, and risks for both the utility and the CDG Sponsor."[9] This highlights again why net crediting is the optimal way to implement consolidated billing for community solar.

V. NET CREDITING BENEFITS AND LOW AND MODERATE-INCOME CONSUMER PARTICIPATION

Q12: HOW DOES NET CREDITING IMPACT THE CUSTOMER EXPERIENCE?

A: From the customer perspective, net crediting produces a clear and predictable result:

- The utility bill reflects the community solar benefit.
- The customer sees savings immediately, and
- The customer does not need to reconcile two bills across different timelines.

Therefore, "**consolidated billing simplifies the billing process for customers** by combining all charges and credits associated with electricity service and community solar subscriptions into a single bill. The potential benefits of consolidated billing implementation include increased transparency, improved customer experience, and, ultimately, increased retention rates and decreased subscriber acquisition costs."[10]

When designed properly, consolidated billing improves transparency and predictability for customers, reduces billing confusion, and strengthens customer trust in the program. Over time, these improvements can lead to higher retention rates and lower subscriber acquisition costs, supporting a more stable and scalable community solar market. In practice, this is easier to explain, easier to administer, and results in fewer billing-related complaints. It is also particularly important for customers with limited economic resources or fixed incomes because it reduces what is owed to the utility without requiring a separate payment to a third party.

Q13: CAN NET CREDITING BE DETRIMENTAL TO COMMUNITY SOLAR SUBSCRIBERS?

A: No, net crediting, as previously defined, if implemented properly, cannot harm customers. Mr. Wemple uses examples from retail energy, where customers have either been enrolled without their consent or have signed contracts that offer them deceptive short-term savings that expire unexpectedly and which have resulted in customers in several states paying millions more than they would have if they continued to be supplied by the utility. However, these examples ignore

[9] Case 19-M-0463. In the Matter of Consolidated Billing for Distributed Energy Resources. Order Regarding Consolidated Billing for Community Distributed Generation. (State of New York Public Service Comission.December 12, 2019).

[10] Sandler, Simon, Bentham Paulos, and Jenna Harmon. 2024. Community Solar Billing: An Exploration of Implementation and Alternatives. Golden, CO: National Renewable Energy Laboratory. NREL/TP-6A20-90867. https://www.nrel.gov/docs/fy25osti/90867.pdf.

the fact that under net crediting, a customer cannot be charged more than they would have without community solar, unlike in competitive retail energy. He even goes on to reference the "elimination of UCB for low-income customers" and cites SB1 in Maryland to make the point that "This experience suggests that UCB can actually be detrimental to the advancement of community solar if it results in a negative consumer experience." While Mr. Wemple is correct that negative customer experience can be detrimental to the advancement of community solar, the example he cites is misleading, as it conflates community solar and retail energy. SB1 in Maryland did eliminate POR for retail energy supply, but that ruling has zero bearing on UCB for community solar (i.e. net crediting), which is alive and well.[11]

To ensure community solar subscribers avoid negative customer experiences that could be detrimental to the advancement of community solar, the proper implementation of net crediting by the utility is essential. This is further discussed below in the context of best practices and ways to ensure the success of community solar.

Q14: HOW DOES NET CREDITING IMPACT LOW AND MODERATE-INCOME CUSTOMER ACCESS?

A: Net crediting is essential to making community solar accessible to low- and moderate-income customers. Community solar programs often struggle to meet LMI participation goals when customers face complicated billing structures, delayed savings, and unpredictable payment obligations[12].

Net crediting addresses these barriers by making savings:

- immediate
- predictable and
- visible on the utility bill.

When paired with appropriate credit values, low barriers to entry and customer protections, net crediting reduces household energy burdens and supports stable participation. In states where LMI enrollment has lagged, consolidated billing has been used as a practical tool to improve participation and retention.

"Consolidating all charges and credits onto one monthly utility bill makes it easier for low-income households to track their savings, removes the need for multiple payments and allows LMI households who are unbanked, on payment plans or balanced billing to participate in

[11] Final rules for consolidated billing in the permanent program were adopted on September 22 2025.

[12] Sandler, Simon, Bentham Paulos, and Jenna Harmon. 2024. Community Solar Billing: An Exploration of Implementation and Alternatives. Golden, CO: National Renewable Energy Laboratory. NREL/TP-6A20-90867. https://www.nrel.gov/docs/fy25osti/90867.pdf.

community solar. This improves the experience of participating in community solar, expands access, and enhances long-term retention"[13].

As the New Jersey Board of Public Utilities stated in the draft order approving its permanent program: "The net crediting model will facilitate the inclusion of low-income customers in the CDG program and ensure that participating low-income customers will benefit. Because the net crediting model allows customers to cover the full cost of their subscription by paying their utility bill and guarantees that the utility bill will always be lower than it would be if the customer was not a CDG member…. low-income customers will be able to receive their low-income bill discount while also receiving a further reduction in their bill through the Net Member Credit from a CDG project."[14]

Q15: HOW DOES NET CREDITING INTERACT WITH ENERGY ASSISTANCE PROGRAMS/DISCOUNTS?

A: Net crediting amplifies the impact of energy assistance or bill discount programs. Since the customer discount reduces the amount owed to the electric utility, it reduces the customer's balance, but only a portion of the bill is offset, so the customer can utilize any credits available from the Low Income Home Energy Assistance Program (LIHEAP) or other discount programs and can make those monies go further. "Utility-consolidated billing in particular can help ensure that bill assistance payments to the utility lower the full cost of the customer's electricity usage, including community solar generation and program participation costs, rather than just the net costs of electricity usage minus the generation credit."[15] As a result, the customer's energy burden is reduced further, and since the customer's obligation to the utility is lower, the risk of non-payment for the utility is also lower, which reduces the likelihood of disconnections for non-payment, and the economic and health impacts that can result from them, as well as reducing the burden on all ratepayers from uncollectible accounts.

Q16: BESIDES SUBSCRIBER ORGANIZATIONS, DOES NET CREDITING PROVIDE BENEFITS FOR ANY OTHER STAKEHOLDERS?

A: Net crediting benefits not only subscribers, but also utilities and the broader market.

First, because customers receive savings directly on their utility bill, net crediting reduces the likelihood of nonpayment and improves customer outcomes. Second, it reduces administrative friction, customer confusion, and billing disputes, which lowers program overhead for subscriber organizations and utilities alike.

[13] Policy Solutions for Inclusive Solar Access: Designing Community Solar Programs for Low-to-Moderate Income Households. Coalition for Community Solar Access. June 2024,,.

[14] In the Matter of the Community Solar Energy Program - Order Launching the Community Solar Energy Program. BPU Docket No. QO22030153. August 16, 2023.

[15] Fazeli, Sandy. Community Solar Consolidated Billing: Review of State Requirements, Policies and Key Considerations. National Association of State Energy Officials. May 2023

Net crediting also strengthens the market by improving project revenue certainty. When project owners are paid through a settlement mechanism tied to utility billing credits, collection risk is reduced. That improved revenue certainty lowers financing risk, reduces the cost of capital, and supports investment in additional community solar projects.

For New Orleans, these market impacts matter. Stable program design and predictable billing mechanics are foundational to building a scalable community solar market that can deliver meaningful savings and align with broader clean energy and resilience goals.

When the legislature in Maryland approved the expansion of its community solar pilot into a permanent program, it outlined the various ways in which community solar benefits the entire solar industry. That program was approved with the inclusion of consolidated billing with net crediting contemplated as one of the two billing options, providing payment guarantees. The commission made this decision by reasoning that the community solar program:

- "Incentivizes solar companies to provide service to low- and moderate-income customers;
- Attracts new investment in Maryland's renewable infrastructure and green economy;
- Allows renters to contract for solar energy.[16]"

Across states that have adopted net crediting, regulators have repeatedly cited not only the benefits to participants but also the benefits to the continued development of the solar sector and, in turn, the benefits provided to all ratepayers and the grid from the deployment of these clean generation assets.

VI. ADDRESSING MISCONCEPTIONS ABOUT NET CREDITING

Q17: CAN NET CREDITING HARM CUSTOMERS BY INCREASING ENERGY BILLS?

A: No**. Under a properly designed net crediting model with guaranteed discounts, customers should not pay more than they would have otherwise.** The rules, as proposed, include a requirement to provide guaranteed savings: "The Guaranteed Savings Rate shall be 20% for Low Income Subscribers and 10% for non-Low Income Subscribers." Because a customer is guaranteed to retain a portion of the bill credit value, and that portion of the bill credit reduces their energy expenditures, a community solar participant will never pay more than they would have if they were not enrolled in community solar. Furthermore, since the mechanics of net crediting are based on parsing a bill credit into components, a customer discount can never be less than 0%, and a utility can never issue a payment for more than the value of the bill credit.

[16] https://www.psc.state.md.us/regulated-utilities/electricity/renewable-energy/community-solar-program/

Q18: DOES NET CREDITING INCREASE COLLECTIONS RISK FOR THE UTILITY (ENO)?

A: No. Under net crediting, the Subscriber Organization (SO) is compensated by receiving a portion of the value of the Subscriber's bill credit, which the utility withholds and remits directly to the SO.

Opposing testimony suggests that this arrangement allows developers to avoid billing, collections, and customer care responsibilities, while shifting financial and business risk onto the utility and, ultimately, its customers. That characterization is inaccurate.

As ENO's witness, Ms. Lejeune noted previously, the portion paid to the SO is not a new charge and does not represent additional amounts the utility must collect from the customer. Rather, it is a portion of the bill credit itself. Bill credits represent the monetary value of generation delivered to the utility from the community solar facility. Under net crediting, the utility allocates the bill credit value between (1) the customer savings portion and (2) the portion remitted to the SO, instead of applying the full value of the bill credit to reduce the customer's regulated utility charges.

Importantly, net crediting does not create new utility receivables or impose new collection obligations. The correct way to evaluate collection risk is to compare a community solar subscriber to the appropriate counterfactual: a non-subscribing customer. For a customer who does not participate in community solar, the utility provides electric service and is responsible for billing and collecting the full amount owed for regulated charges. Under net crediting, a subscribing customer receives savings directly on their utility bill, which reduces what the customer owes ENO for the same regulated service. This is because a community solar subscription is an agreement to receive bill credits, not a separate sale of electricity.

As a result, net crediting reduces the utility's receivables and decreases overall collection risk. That outcome benefits all customers, including non-participants, because lower collection risk supports system-wide affordability and improves overall utility financial performance. For these reasons, net crediting is not only workable from an operational perspective but is also aligned with the public interest.

ENO's witnesses have repeatedly asserted that consolidated billing places additional risk on utilities and, by extension, on non-participant ratepayers. This concern is unfounded. Net crediting customers are guaranteed savings, as outlined in the proposed rules and redlines submitted to the Council, and would therefore owe ENO less than they otherwise would have absent participation. Even in a nonpayment scenario, ENO's exposure will not be increased; if anything, any risk is reduced, because the customer's net utility charges are lower.

This conclusion has been recognized by other regulators. In approving net crediting, the New York commission explained:

> "*The Commission agrees that this method (net crediting) is simpler administratively and reduces risks for both CDG Sponsors and the Joint Utilities as compared to other models…As compared to the more traditional consolidated billing used for ESCOs,*

where the ESCO identifies a charge for the utility to put on the customer's bill and the utility collects that charge on behalf of the ESCO, the net crediting model avoids putting the utility in the position of collecting a higher charge than it would have applied to the customer by guaranteeing savings to the customer. Therefore, it can be assumed that any partial payment or nonpayment would have happened even in the absence of the customer's CDG membership and there is no risk that the amount of uncollectibles or the utility's exposure will increase."[17]

Similarly, while determining the appropriate consolidated billing methodology for Maryland's permanent community solar program, the Commission rejected arguments from Exelon to implement UCB with prorated customer payments, which is what ENO's experts argue the utility must develop. The Maryland commission evaluated both alternatives and found in favor of net crediting, stating:

"*Bill collections risk is already assumed by the utilities regardless of whether or not a customer is subscribed to a community solar project. The utilities also have extensive collections procedures that have been established over decades providing them with experience in this realm, whereas subscriber organizations do not have this experience in collections procedures*."[18]

Q19: DOES NET CREDITING LEAD TO MORE CUSTOMER CONFUSION & DO CUSTOMERS PREFER DUAL BILLING?

A: ENO's expert suggests that consolidated billing may be more confusing for customers; however, based on independent evaluations of billing mechanisms for community solar[19], the opposite is true. Dual billing is inherently harder for customers to understand because it requires reconciling two separate bills across different timelines.

Under net crediting, customer understanding depends on clear bill presentation. If the consolidated bill includes:

- the customer's share of generation or credit value
- the customer savings amount or percentage
- the administrative fee
- and the net credit remitted to the project owner

Then customers can easily verify they are receiving the savings promised in their contract.

[17] Case 19-M-0463. In the Matter of Consolidated Billing for Distributed Energy Resources. Order Regarding Consolidated Billing for Community Distributed Generation. (State of New York Public Service Comission.December 12, 2019).

[18] Administrative Docket RM 56. Revisions to COMAR 26.62 Community Solar Energy Generation Systems. Order No. 91524: Order on Consolidated Billing For the Maryland Community Solar Program. (Public Service Comission of Maryland, February 10, 2025).

[19] Mr. Wemple contends there is no evidence pointing to net-crediting as a best practice but reports cited here from NASEO, NREL, NCSP and CCSA all advocate for the use of net crediting to eliminate customer confusion and improve the customer experience.

In markets where net crediting is widely used, billing-related complaints tend to decrease significantly compared to dual-billing markets. The most common customer questions typically relate to project timing—such as when a project begins generating, rather than disputes about whether savings are being delivered once credits are flowing.

ENO's expert also raises the idea that customers may want to opt out of net crediting. In practice, opt-out is generally uncommon for residential customers because net crediting is the simplest way to ensure reliable monthly savings. Some states have gone further by requiring net crediting for residential customers because it is a core consumer protection feature that supports consistent savings and reduces billing confusion.

Q20: IS NET CREDITING ONLY APPROPRIATE IN DEREGULATED ENERGY MARKETS?

A: No**.** Mr. Wemple asserts that consolidated billing is more appropriate in open retail markets because utilities in those markets purportedly have an administrative or systems advantage, and that vertically integrated utilities therefore face prohibitively higher costs to implement UCB. That conclusion does not follow from the evidence.

Utilities in open retail markets have consistently argued that adopting net crediting or other forms of UCB for community solar requires significant and costly modifications to proprietary billing systems. The existence of consolidated billing for third-party supply does not eliminate the need for potentially substantial system changes to support community solar crediting and reporting. Therefore, operating in an open retail market does not inherently imply an implementation or cost advantage.

Because utility billing systems are highly customized and proprietary, cost comparisons across utilities and market structures are inherently difficult, as NREL notes. However, where cost data is available, it contradicts Mr. Wemple's claim. NREL's analysis shows that among utilities for which implementation and maintenance costs could be identified, Xcel Energy in Minnesota, a vertically integrated, regulated utility, reported the lowest estimated costs to implement and maintain consolidated billing for community solar.

Further, while ENO's concerns mirror those raised by other utilities, actual implementation experience shows costs have been manageable. To date, utilities that have adopted consolidated billing for community solar have recovered administrative costs through modest fees, typically set at approximately one percent, with no increases.

Finally, Mr. Wemple himself identifies multiple community solar markets that have adopted consolidated billing despite not operating in open retail markets, demonstrating that competitive retail market participation is not a prerequisite for implementation. Thus, the fact that ENO operates in a regulated market does not mean that UCB is inappropriate for its territory or that implementation would be prohibitively expensive.

VII. CORRECTING THE RECORD ABOUT DUAL BILLING

Q21: CAN DUAL BILLING BE HARMFUL FOR LMI CUSTOMERS?

A: Yes. In a dual billing market, when a customer receives more credits than can be used to offset charges on their electric bill in a given month, which is highly likely to happen during peak generation months, like summer (due to normal peaks in production due to longer daylight hours), customers often must pay in full for all credits allocated, not only those they used in a given month. Therefore, a community solar subscriber pays more than they would have without community solar in a given month and can't monetize the savings from all their community solar bill credits until much later. And this billing arrangement is, in most cases, the only option, since in dual billing markets like Massachusetts, the subscriber organization is provided data on the value of all credits allocated to a customer, not only those used.

This can be compounded for any customer receiving energy assistance benefits and credits from programs likeLIHEAP. For a customer on LIHEAP who receives enough community solar bill credits to reduce their utility bill to zero, they will be unable to apply any LIHEAP credits, but must still pay the subscription organization for the full value of credits allocated. This can result in unspent LIHEAP funds and higher overall energy expenses than the customer would have had without community solar. Additionally, "benefit levels [are] based on various factors (such as the applicant's energy providers, income, and number of people in the household), and provide payments directly to the utility or fuel vendor to lower the total household bill. Nearly half of the states incorporate energy burden and costs into their LIHEAP benefits calculation. In dual billing, the reduced household electric bill (which only factors in the community solar generation credits, but not the subscription costs) may inadvertently prompt a reduction in benefits during the next application period".[20] The only exception is Minnesota, where LIHEAP includes community solar costs in the energy burden calculation and can make direct payments to subscriber organizations.

Though credit requirements for customer enrollment are less common today due to consumer-friendly policies, in markets where they are not banned and rely on dual billing, financing parties hedge against the risk of non-payment from individual subscribers by "typically contract[ing] only with customers with good credit histories,"[21] making it more difficult for LMI customers to qualify. Therefore, a dual billing mechanism imposes many hurdles in LMI participation.

Q22: CAN ANY OTHER CUSTOMERS BE HARMED UNDER A DUAL BILLING FRAMEWORK?

A: Yes. In some community solar markets, community solar is not compatible with utility payment plans and assistance programs such as level-bill pay, also known as budget billing. Thus, customers with limited incomes or those who simply wish to have a predictable monthly

[20] Community Solar Consolidated Billing: Review of State Requirements, Policies and Key Considerations. National Association of State Energy Officials.

[21] Case 19-M-0463. In the Matter of Consolidated Billing for Distributed Energy Resources. Order Regarding Consolidated Billing for Community Distributed Generation. (State of New York Public Service Comission.December 12, 2019).

energy spend cannot participate in community solar because the utility billing system does not allow for savings from community solar credits to reduce the monthly total due from their payment plan option. In those cases, a subscriber must pay the utility in full based on their payment arrangement and pay the community solar provider for all credits allocated for that month. The customer, therefore, cannot realize any savings until the utility performs a true-up, which typically only happens once or twice a year. In order for customers to benefit from community solar participation, they cannot participate in any payment arrangement that stabilizes their monthly payments. This remains true even today in both Massachusetts and Minnesota, the two oldest community solar markets[22].

Q23: ARE COMMUNITY SOLAR MARKETS WITH DUAL BILLING THRIVING?

A: Mr. Wemple asserts that community solar markets have been able to grow and thrive under a dual billing model. While it is true that certain states have developed sizable community solar markets without consolidated billing, that point is incomplete and can be misleading in the context of this proceeding. The existence of market growth under dual billing does not necessarily mean that dual billing is the most effective, consumer-friendly, or equitable billing mechanism—particularly where the goal is to expand access and deliver reliable savings to low- and moderate-income (LMI) households.

First, dual billing markets have often struggled to meaningfully serve LMI customers. For example, Massachusetts' SMART program, the second oldest community solar market, calculated that despite additional incentives for projects enrolling LMI customers, only 2.5% of all SMART capacity benefited customers eligible for low-income rates.[23] Accordingly, it made substantial improvements to the program in the SMART 3.0 order, and also notably approved consolidated billing for community solar for projects serving low-income customers known as Low Income Community Share Solar (LICSS). This reflects a broader pattern: dual billing can create timing delays, reconciliation challenges, and multiple payment obligations that disproportionately affect households with limited flexibility in monthly budgeting.

Second, in the limited instances where dual-billing markets have enrolled LIHEAP recipients without negative impacts, those outcomes have often depended on unique administrative workarounds that have not proven replicable in other jurisdictions. Minnesota, for instance, implemented a mechanism that allowed LIHEAP funds to be directed in a way that reduced harm to LIHEAP recipients participating in community solar. However, this approach was highly specific to Minnesota's program structure and required coordination that other states have generally been unable to replicate. Efforts to implement similar approaches through other state LIHEAP agencies have not succeeded, in part because other states recognized that

[22] Xcel Minessota. Community Solar Gardens - Subscriber Payment and Credit Details.
[23] Order on Low Income Solar Access. Massachussetts Department of Public Utilities. June 4, 2024.

consolidated billing/net crediting makes such workarounds unnecessary by applying savings directly through the utility bill[24].

Minnesota's recent program redesign further reinforces the limitations of dual billing as a long-term strategy, particularly for achieving LMI participation goals. Beginning in 2024, Minnesota made sweeping changes to its Community Solar Gardens program and launched a new program administered by the Minnesota Department of Commerce rather than Xcel Energy. The new program, known as the Low- and Moderate-Income Accessible CSG Program, includes a requirement that at least half of all subscribers meet LMI income qualifications. It also allows subscribers to enroll in utility consolidated billing using the same net crediting model implemented in leading community solar markets such as New Jersey, New York, and Maryland.[25] Under this model, customers receive guaranteed savings, the utility retains a modest administrative fee (typically one percent), and project owners receive a monthly remittance equal to the value of bill credits, less customer savings and the utility administrative fee. Beginning in 2025, subscribers have the option to enroll in consolidated billing, meaning subscription charges will no longer be paid separately to the community solar operator.

It is also important to recognize that some dual billing markets were able to scale in part because of program design features that reduced reliance on customer subscription payments as the sole source of project revenue. In Massachusetts, for example, projects may receive additional compensation through renewable energy credits (REC)s or incentive payments under SMART that are separate from bill credits. As a result, project economics are not driven exclusively by customer collections. In addition, Massachusetts, Minnesota, and New York do not universally require community solar projects to enroll income-restricted customers and instead rely on adders or separate incentives to encourage LMI participation. Even with those incentives, voluntary adoption and LMI enrollment have often fallen short of policy goals in practice.

For these reasons, **the fact that certain states have built community solar markets under dual billing does not establish that dual billing is the best model for New Orleans**, particularly where the program is intended to reliably deliver savings, minimize customer confusion, and expand access for LMI households. Dual billing is a blunt policy instrument that will likely hinder success. By contrast, consolidated billing through net crediting is a proven mechanism to advance these public interest objectives and has been adopted in multiple leading community solar markets specifically to improve customer outcomes and equitable participation.

VIII. COMMUNITY SOLAR BEST PRACTICES & OTHER CONSIDERATIONS

[24] The National Community Solar Partnership built a tool to facilitate enrollment of LIHEAP recipients in community solar projects known as the Clean Energy Connector tool. Six states participated in the pilot as of December 2024 no substantive impacts from this report were reported. https://www.energy.gov/communitysolar/clean-energy-connector

[25] Minnesota Department of Commerce, Low- and Moderate-Income Accessible CSG Program. https://mn.gov/commerce/energy/consumer/energy-programs/community-solar-gardens-consumers.jsp

Q24: ARE THERE OTHER WAYS TO EFFICIENTLY DELIVER SAVINGS TO LMI CUSTOMERS?

A: Yes**.** Some states and utilities have adopted complementary program designs intended to expand access to bill credits for income-qualified customers, including no-cost or opt-out bill crediting pooled benefit models that function as an additional form of energy assistance. Some examples include New York's Statewide Solar For All (SSFA) program and Massachusetts's Eversource Community Solar Program (ECSAP).

These programs simplify participation by removing enrollment barriers and ensuring that eligible households can automatically receive bill credits without needing to opt-in or navigate complex subscription processes. They reflect good policy intent and can play a useful role, particularly in markets with very large opportunities for LMI community solar capacity deployment, and deliver meaningful household energy savings.

It is important to note that these pooled-benefit programs serve a limited subset of customers, typically those who meet strict income qualification thresholds. In markets where energy assistance is limited or underfunded, auto-enrollment programs offer an especially valuable pathway by guaranteeing bill reductions for hard-to-reach customers who might otherwise struggle to access or maintain participation in traditional community solar offerings. While that support is very valuable, it leaves out many households with high energy burdens who may not qualify for energy assistance. Traditional community solar programs, by contrast, distribute savings to a broader group of customers, including households just above income thresholds that make them ineligible for assistance but who nevertheless face a significant energy burden. For this reason, you see these pooled-benefit programs operating alongside traditional community solar, giving developers and customers more options for participation

Most importantly, t**hese program models do not avoid net crediting; they rely on it**. Programs like SSFA and ECSAP use the same net crediting billing framework in order to provide reliable and clear savings and display them on customer bills. While these programs may reduce or eliminate the need for a third-party subscriber management firm, they still require investments in customer education, utility staff training, and clear opt-out processes, particularly where customers also have the option to participate in traditional community solar.

Therefore, while not replacing net crediting, pooled-benefit models can be **complementary** tools to help address certain customer protection or access concerns.

Q25: IN ADDITION TO NET CREDITING, WHAT ADDITIONAL BEST PRACTICES ARE ESSENTIAL TO ENSURE A SUCCESSFUL COMMUNITY SOLAR PROGRAM

A: Net crediting is a necessary but not sufficient condition for a successful community solar program. Program success depends on a combination of thoughtful program design and effective utility implementation.

Key design elements include adequate and predictable financing structures to attract investment and support sufficient project development; clear and enforceable LMI carve-outs; and eligibility criteria that are inclusive, equitable, and adaptable to regional cost-of-living differences. Enrollment and income verification methods should minimize administrative burden and avoid intrusive or exclusionary requirements, such as credit checks or income documentation, and should prioritize streamlined approaches like categorical eligibility tied to existing federal or state assistance programs, and, ideally, self-attestation.

Strong customer protections are also essential, including guaranteed and meaningful bill discounts, enhanced savings for income-restricted customers, and safeguards that make participation simple and low-risk. Equally important are measures that ensure utility accountability, including timely and accurate billing and crediting, reliable reporting to subscriber organizations, and clear customer communications. Consolidated billing plays a critical role in this framework by ensuring consistent and transparent delivery of savings directly on the utility bill.

While consolidated billing alone will not guarantee a successful community solar program, it is an essential component of a well-designed program that delivers real customer benefits and a positive customer experience, particularly for LMI customers. Together, these elements support customer trust, investor confidence, and program scale, which are especially important in emerging and capacity-constrained markets like New Orleans.

IX. RECOMMENDATIONS AND CONCLUSIONS

Q26: DOES NET CREDITING SERVE THE PUBLIC INTEREST?

A: Yes. The record demonstrates that consolidated billing for community solar through a net crediting framework is in the public interest because:

- it improves customer outcomes,
- strengthens customer protections,
- reduces utility risk, and
- supports the development of a stable and scalable community solar market.

Experience in early community solar markets shows that dual billing produces predictable and recurring consumer harm, including delayed visibility of savings, billing confusion, and cash-flow mismatches between credits and subscription invoices. These issues are a leading cause of customer complaints and cancellations and disproportionately affect customers with fixed incomes or limited financial flexibility. A billing framework that obscures savings and undermines customer confidence is inconsistent with the Council's consumer protection and affordability objectives.

Net crediting directly addresses these deficiencies by delivering guaranteed savings transparently and immediately on the utility bill. Customers owe less to the utility each month and are not required to reconcile multiple bills across different timelines to confirm that savings are being delivered. Properly designed net crediting frameworks ensure that customers cannot

pay more than they would have absent participation, providing a level of consumer protection that is not present in alternative billing models.

Contrary to the assertions of ENO's witnesses, net crediting does not require the utility to collect third-party charges or assume new collection risk. The Subscriber Organization is compensated through a portion of the bill credit itself, which the utility withholds and remits through settlement. No new customer charge is created, and the utility is not placed in the position of collecting subscription fees on behalf of a third party. As a result, net crediting does not increase utility receivables and, in practice, reduces collection risk by lowering customer balances.

Net crediting is also essential to achieving low- and moderate-income participation goals. By consolidating savings onto the utility bill, net crediting accommodates unbanked customers and thoseon payment plansor who receive energy assistance, reduces energy burden, and lowers disconnection risk. These outcomes directly advance the Council's equity, affordability, and access objectives.

For these reasons, net crediting is the billing mechanism that is most reasonable, sensible, and aligned with the public interest.

Q27: WHAT IS YOUR RECOMMENDATION FOR THE COUNCIL WITH REGARDS TO CONSOLIDATED BILLING FOR COMMUNITY SOLAR?

A: Based on the record, the Council should approve consolidated billing for community solar implemented through a net crediting framework and reject alternative models that rely on posting and collecting third-party subscription charges on the utility bill.

Net crediting is a proven billing methodology that has been successfully implemented in established community solar markets and repeatedly approved by regulators because it reduces administrative complexity, lowers consumer confusion, and minimizes risk for utilities and ratepayers. Unlike the consolidated billing model described by ENO's experts, net crediting does not require the utility to collect subscription fees, does not create new utility receivables, and does not expose non-participating customers to increased financial risk.

Adopting consolidated billing with net crediting will:

- ensure that customer savings are delivered transparently and predictably;
- strengthen consumer protections through guaranteed savings;
- expand access for low- and moderate-income customers;
- reduce billing disputes and program administration costs; and
- improve revenue certainty for community solar projects and support stable market growth.

Therefore, the Council should find that consolidated billing with net crediting is the most consumer-protective and administratively sound approach for community solar and approve its implementation as proposed.

Q28: DOES THIS COMPLETE YOUR TESTIMONY?

A: Yes it does.

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: A RULEMAKING PROCEEDING	)	
TO ESTABLISH RULES FOR	)	
COMMUNITY SOLAR PROJECTS	)	**DOCKET NO. UD-18-03**

AFFIDAVIT OF GEORGINA ARREOLA-LENNOX

STATE OF MASSACHUSSETTS)
)
COUNTY OF SUFFOLK)

I, Georgina Arreola-Lennox, being first duly sworn on oath, state that I am the same Georgina Arreola-Lennox identified in the direct testimony to be filed in this docket on 13 February 2026, that I have caused the testimony and exhibits to be prepared and am familiar with its contents, and that the testimony and exhibits are true and correct to the best of my knowledge and belief as of the date of this affidavit.

Georgina Arreola-Lennox

Georgina Arreola-Lennox
13 February 2026

Subscribed and sworn to me this 13th day of February 2026.

LEIGHTON V BRIDGE
Notary Public - State of Florida
Commission # HH717699
Expires on September 8, 2029

State of Florida

County of Santa Rosa

Leighton V Bridge

Notarized remotely online using communication technology via Proof.

EXHIBIT A:

CURRICULUM VITAE OF GEORGINA ARREOLA-LENNOX

GEORGINA ARREOLA-LENNOX

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Areas of Expertise

Public Policy Analysis

Extensive experience conducting public policy and program analysis across more than 15 community solar and clean energy markets, including evaluation of legislative and programmatic frameworks supporting energy efficiency, solar, storage, electric vehicles, and electrification. This work has included primary and secondary research in collaboration with universities and national laboratories, as well as authorship of policy-relevant analyses and reports informing program design, market transformation, and customer-focused outcomes.

Program Design & Evaluation

Extensive experience designing program frameworks and evaluation methodologies for large-scale state and local clean energy initiatives across multiple jurisdictions, including distributed generation, vehicle electrification, energy efficiency, and demand management. This work has included leading analytical efforts to secure and extend multibillion-dollar incentive programs, as well as developing monitoring, reporting, and compliance systems to assess performance, equity outcomes, and improve program delivery through continuous process optimization.

Quantitative & Qualitative Analysis

Experience applying quantitative and qualitative research methods to evaluate clean energy programs, market adoption, and customer behavior, including the design and administration of large-scale, multi-state surveys and the first longitudinal electric vehicle adoption study across several states including NY, MA & CA. This work has included advanced statistical analysis and economic modeling, bilingual focus group research, production of defensible expert analyses for litigation, and graduate-level instruction in statistics and applied decision-making.

Renewable Energy Adoption

Extensive experience conducting policy and program evaluation to support large-scale adoption of clean energy technologies, including solar, electric vehicles, energy efficiency, storage, and electrification. This work has included applied research to assess adoption barriers and customer pathways, design and evaluation of state and local programs, and evidence-based analysis that informed program improvements, reduced soft costs, and supported market expansion across multiple jurisdictions.

Equity Advocacy

Extensive experience advancing equity-focused community solar and clean energy policies aimed at improving affordability and access for low- and moderate-income households, including promotion of utility consolidated billing (net crediting) and streamlined income eligibility approaches. This work has included national policy leadership, collaboration with labor and community-based organizations, and applied research examining energy equity outcomes for underserved populations, including Latino households and access to energy efficiency programs.

Operational Efficiency & Process Improvement

Extensive experience leading and optimizing end-to-end community solar servicing operations, including customer support, billing, subscription management, reporting, and sales operations across multiple organizations and utility territories. This work has focused on scaling operational infrastructure, improving data and billing systems, managing large project portfolios, and implementing process improvements—such as transitions to utility consolidated billing—that increased efficiency, accuracy, and overall program performance.

Regulatory & Business Strategy

Extensive experience managing multi-state regulatory engagement and compliance for clean energy programs, including coordination with regulatory agencies, utilities, and industry stakeholders. This work has included development of compliance and enterprise risk management frameworks, support of successful regulatory proceedings across multiple jurisdictions, and integration of regulatory requirements into market entry, product design, and operational decision-making.

Areas of Expertise

Community Solar Operations & Policy

Over seven years of experience in the community solar sector in various leadership capacities during which I worked on community solar servicing as part of a community solar project development firm BlueWave Solar, and later an independent Subscriber Management aka "subscriber organization". In 2024, Perch Energy was the second the largest subscriber organization and managed over 30K customer subscriptions and ~1GW of active community solar projects across: NY, MA, MN, ME, IL, NJ, MD, DC and today is the largest firm of it's kind in the sector. During my time as Director and later Vice President of Operations and later Vice President of Policy I held many responsibilities including:

- Senior leadership experience across policy, regulatory affairs, and operations in the community solar sector, spanning market entry, program administration, customer servicing, and regulatory compliance.
- Extensive hands-on experience with customer billing and solar crediting, including oversight of both dual-billing and utility consolidated billing (net crediting) structures to ensure accurate credit application and customer savings.
- Managed the full lifecycle of community solar customer subscriptions, from enrollment and onboarding through ongoing billing, credit reconciliation, reporting, and customer retention.
- Led customer support and servicing functions addressing billing inquiries, credit disputes, and program questions, with a focus on improving customer experience and reducing participation barriers.
- Interfaced with utilities on data access, quality, and reporting: subscription data exchange, credit allocation, and performance reporting across territories.
- Served as a primary point of contact with state regulators, public utility commissions, and program administrators on community solar program design, implementation, and compliance.
- Led and supported advocacy efforts to improve community solar rules and program design, emphasizing consumer protection, operational feasibility, and equitable access.
- Successfully advocated for utility consolidated billing (also known as net crediting) to simplify participation and improve customer experience, with favorable outcomes in New York, New Jersey, Massachusetts, Maryland, and Illinois.
- Participated in the Billing & Crediting Working Group led by DPS & NYSERDA from 2019-2024 — group dealt with the implementation of consolidated billing for VDER in New York, project reporting, billing and crediting issues, and consumer protection, as well as utility performance.
- Participated in the Billing & Crediting Working Group established by NJBPU to oversee the development and implementation of UCB (net crediting) in New Jersey, 2024-2025.
- Participated in RM56 in the NEM working group led by Maryland commission staff to write rules for consolidated billing for Maryland's permanent program and successfully advocated for the use of net crediting methodology, approved by the commission in 2025: Maryland PSC Order #91524.
- Championed policies and program features that prioritize the inclusion of low- and moderate-income (LMI) customers, including streamlined enrollment and reduced administrative burden.
- Served as co-chair of the LMI policy committee as a member of the largest industry coalition in community solar (CCSA) for two years.

Professional Experience

Energy Policy & Strategy Consultant — 04/2025 - Present

Perch Energy — Boston, Massachusetts

Vice President of Policy & Regulatory Affairs — 06/2022 - 04/2025

Vice President of Operations & Corporate Secretary — 03/2021 - 05/2022

BlueWave Solar — Boston, Massachusetts

Vice President of Operations — 11/2020 - 03/2021

Senior Director of Finance Operations — 11/2019 - 10/2020

Director of Data Operations — 07/2018 - 11/2019

Economic Consultant — San Diego, California

Economic Research Analyst & Expert Witness — 09/2005 - 11/2020

UC San Diego — San Diego, California

Faculty - School of Medicine — 08/2012 - 12/2012

Center for Sustainable Energy — San Diego, California

Research Analyst — 04/2011 - 07/2018

Corporate Recovery Associates — San Diego, California

Financial Analyst — 09/2009 - 11/2010

Georgetown University - Center for New Designs In Learning and Scholarship — Washington, DC

Graduate Associate - Assessment — 01/2008 - 07/2009

Education

Georgetown University — Washington DC
Master of Public Policy in International Development & Energy Policy — 08/2007 - 05/2009

UC San Diego — San Diego, CA
Bachelor of Science in Management Science — 09/2001 - 06/2005

Presentations

Strategies for Best Practices to Increase Community Solar Adoption Among LMI Households — Community Solar Innovation Summit 2024

Cutting Through the (Illi)Noise: Unlocking Solar Access For Communities in the Midwest — RE+ Midwest 2023

IRA & ILJA: Impacts and Opportunities for Development — Midwest Solar Expo 2023

Solar Power World: Contractors Corner — January 23, 2023

How to Engage Latino Communities in Energy Efficiency Upgrades — Empowering Texas Communities Conference 2018

Electric Vehicle Rebates: Exploring Indicators of Impact in Four States — EV Roadmap 11, 2017

EV adoption trends across the US — Behavior Energy and Climate Change Conference (BECC 2014)

Expanding EV Market access in Disadvantaged Communities — Behavior Energy & Climate Change Conference (BECC 2015)

The Role of Incentive Program Design Features in Electric Vehicle Choice: 3 State EV Incentive Rebate Program Analysis — Behavior Energy & Climate Change Conference (BECC 2016)

Publications

North American Clean Energy — September/October 2023 Issue
Community solar: Adopt utility-consolidated billing to improve the customer experience
Bruce Stewart, Georgina Arreola

California Energy Comission — CEC-500-2018-018,
California Latino Households and Energy Efficiency Upgrades: Research Findings and Program Recommendations
Laura Parsons, Georgina Arreola, Linda Dethman, Mithra Moezzi, Ed Vine

Center for Sustainable Energy — 2016
Survey of Buyers, Sellers and Realtors Involved In San Diego Third-Party Owned Solar Home Transactions
Georgina Arreola, Timothy Treadwell

Berkeley Lab — LBNL-1003917 · Dec 2015
Survey of Buyers, Sellers and Realtors Involved In San Diego Third-Party Owned Solar Home Transactions
Georgina Arreola, Timothy Treadwell, Ben Hoen