

**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

**DIRECT TESTIMONY
OF
VICTOR PREP
ON BEHALF OF
THE ADVISORS TO THE
COUNCIL OF THE CITY OF NEW ORLEANS**

MARCH 13, 2026

PREPARED DIRECT TESTIMONY

OF

VICTOR PREP

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.**

3 **A.** My name is Victor Prep. My business address is 7800 E. Dorado Place, Suite 145,
4 Greenwood Village, Colorado. I am a registered Professional Engineer in the States of
5 Pennsylvania, Colorado, and Louisiana and an Executive Consultant with the firm Legend
6 Consulting Group Limited (“Legend”).

7 **Q. ON WHOSE BEHALF DO YOU APPEAR IN THIS PROCEEDING?**

8 **A.** I am presenting testimony on behalf of the Advisors to the Council of the City of New
9 Orleans (“Council”). The Council regulates the rates, terms, and conditions of electric
10 service of Entergy New Orleans, LLC (“ENO”),¹ which is a subsidiary of Entergy Utility
11 Holding Company, LLC (“EUH”), which is itself directly and indirectly owned by Entergy
12 Corp. The Council also regulates the rates, terms and conditions of gas service of Delta
13 New Orleans Gas Company, LLC (f/k/a Delta States Utilities NO, LLC).

¹ The Entergy Operating Companies (“EOCs”), as of the preparation of this testimony, are, Entergy Arkansas, LLC (“EAL”), Entergy Mississippi, LLC (“EML”), Entergy Louisiana, LLC (“ELL”), ENO, and Entergy Texas, Inc. (“ETI”). Any reference to the EOCs or an individual EOC should include any successor organization.

1 **Q. PLEASE SUMMARIZE YOUR RELEVANT EDUCATIONAL BACKGROUND**
2 **AND PROFESSIONAL EXPERIENCE.**

3 **A.** Exhibit No. ____ (VP-2) provides a summary of my relevant education and professional
4 experience and Exhibit No. ____ (VP-3) lists my previous testimony experience.

5 **II. PURPOSE OF TESTIMONY**

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

7 **A.** My testimony is offered pursuant to SCHEDULING ORDER and MEMORANDUM dated
8 December 19, 2025, establishing a procedural schedule related to a consolidated billing
9 procedural schedule as part of Council Docket No. UD-18-03, a rulemaking proceeding to
10 establish rules for community solar projects. The purpose of my testimony is to address the
11 changes proposed by the Advisors to the Community Solar Rules (“Rules” or “CSG
12 Rules”) related to implementing consolidated billing in the Community Solar Program. I
13 also discuss how the Proposed CSG Rules mitigate the concerns expressed in the Direct
14 Testimonies of Witness Wemple and Witness Brubaker. The Advisors’ proposed changes
15 were included as Attachment A to the Report of the Advisors Regarding Consolidated
16 Billing for the Community Solar Program (“Advisors’ Report”), dated October 24, 2025.
17 Specifically, Attachment A to the Advisors’ Report is a redline of the changes the Advisors
18 recommend the Council make to the Community Solar Rules if the Council decides to
19 adopt net crediting consolidated billing and is included with my Testimony as Exhibit
20 No.__(VP-4).

1 **Q. PLEASE SUMMARIZE YOUR MAJOR CONCLUSIONS AND**
2 **RECOMMENDATIONS.**

3 **A.** I recommend that, if the Council adopts net crediting consolidated billing in the
4 Community Solar Program, the proposed changes to the CSG Rules (“Proposed CSG
5 Rules”), included as Attachment A to the Advisors’ Report, should be approved and
6 adopted. These Proposed CSG Rules encompass the issues and limited revisions required
7 for the adoption of net crediting consolidated billing.

8 **III. CURRENT STATUS OF THE COMMUNITY SOLAR PROGRAM**

9 **Q. REFERRING TO ENO WITNESS WEMPLE’S STATEMENTS IN HIS**
10 **TESTIMONY: “GIVEN THAT ENO IS JUST COMMENCING ITS COMMUNITY**
11 **SOLAR PROGRAM, UCB [UTILITY CONSOLIDATED BILLING] WOULD BE**
12 **ESPECIALLY INAPPROPRIATE,”² AND “...THE PROGRAM IS STILL IN ITS**
13 **EARLY STAGES...”³, DO YOU AGREE WITH HIS CHARACTERIZATION OF**
14 **THE STATUS OF THE COMMUNITY SOLAR PROGRAM?**

15 **A.** I disagree. Eight years ago, the Council established this Docket No. UD-18-03 to consider
16 a rulemaking proceeding to establish Rules for community solar projects. The Rules for
17 community solar projects were established in March 2019, and the CSG Rules have been
18 amended several times. There have been eleven Council Resolutions since 2019 regarding

² Direct Testimony of Stephen B. Wemple, p. 6, at 17.

³ *Id.*, p. 5, at 9-11.

1 the CSG Rules and related forms and rate schedules related to various requests made by
2 the parties to the docket. As of February 2025, there were 15 CSG projects between the
3 Construction and Application Queues dating back to January 2024, and 3 additional CSG
4 projects on the Waitlist related to the 60 MW cap on CSG projects. Further, there will be
5 an additional period of many months related to: (a) completing the current procedural
6 schedule, (b) a subsequent Council Resolution, and, (c) if consolidated billing is adopted
7 by the Council, ENO's estimated timetable related to billing system changes, prior to any
8 prospective date when consolidated billing would be implemented in the Community Solar
9 Program.

10 **Q. HOW OFTEN IS ENO REQUIRED TO FILE INFORMATION REGARDING**
11 **THE CURRENT STATUS OF THE COMMUNITY SOLAR PROGRAM AND**
12 **CSG FACILITY APPLICATIONS?**

13 **A.** ENO is required to provide information, updated at least quarterly, on its website about the
14 current status of the Community Solar Program and CSG Facility applications, including:
15 name; address; date of application; interconnection status; expected date of operation;
16 percent of the project that is subscribed, and remaining available capacity by year in each
17 program category.⁴

18 **Q. WHAT INFORMATION HAVE YOU FOUND RELATED TO THE CURRENT**
19 **STATUS OF COMMUNITY SOLAR PROJECTS?**

⁴ CSG Rules Para. VII E. (2).

1 A. Information regarding the current status of the CSG Application Queue can be found on
2 ENO's website at [https://www.energyneworleans.com/wp-content/uploads/CSG-
4 application-queue.pdf](https://www.energyneworleans.com/wp-content/uploads/CSG-
3 application-queue.pdf) ; specifically, ENO Assigned ID#, Date Application Accepted,
5 Status, Notes, Capacity MWac, and Category for the CSG Construction Queue, CSG
6 Application Queue, CSG Waitlist, and Currently Available Capacity by Category. The
7 referenced website currently indicates that the above information is based on applications
8 received through February 10, 2025, a copy of which is attached as Exhibit No._VP-5. In
9 the discovery process, the Advisors have requested that ENO provide an updated set of
10 CSG information in the same format, specifying the date, and identifying any changes to
11 individual CSG Project listings since February 10, 2025, with a brief explanation related
to each change.⁵

12 **IV. RECOVERY OF COMMUNITY SOLAR COSTS, INCLUDING**
13 **CONSOLIDATED BILLING**

14 **Q. PLEASE SUMMARIZE THE UTILITY COSTS RELATED TO COMMUNITY**
15 **SOLAR THAT ARE TO BE RECOVERED IN THE UTILITY ADMINISTRATIVE**
16 **FEE UNDER THE CURRENTLY EFFECTIVE COMMUNITY SOLAR RULES.**

17 **A.** The Utility Administrative Fee is a Council-approved charge to the Subscriber
18 Organization designed to cover the following three cost categories related to community
19 solar:

⁵ See CNO 2-10.

1 (1) the Utility's incremental costs associated with integrating the generation from CSG
2 facilities into the Utility's system,

3 (2) administering the contracts with Subscriber Organizations, and

4 (3) administering the CSG Facility's Subscriber billing credits, which includes consolidated
5 billing costs.⁶

6 It is important to recognize that the existing CSG Rules have identified these Community
7 Solar costs for recovery in the Utility Administrative Fee, regardless of whether net
8 crediting consolidated billing is adopted by the Council.

9 **Q. WHAT WOULD CHANGE ABOUT THE UTILITY ADMINISTRATIVE FEE**
10 **UNDER THE PROPOSED CSG RULES?**

11 **A.** The existing CSG Rules (VII.G.(3)) state that “the Utility may assess a Council-approved
12 charge to the Subscriber Organization” to cover three specific categories of incremental
13 Community Solar costs. The Proposed CSG Rules included that this charge be referred to
14 as a Utility Administrative Fee, and that the incremental costs include consolidated billing.
15 The amount of the Utility Administrative Fee would change with the amount of
16 consolidated billing costs, and ENO has provided initial cost estimates. While the Utility
17 Administrative Fee would be recovered from all CSG projects, the billing method with
18 which it would be recovered from developers would differ with dual billing and

⁶ Proposed CSG Rules, Section II. Definitions.

1 consolidated billing. And the Proposed CSG Rules include details related to evaluating and
2 revising the Utility Administrative Fee.

3 **Q. UNDER THE PROPOSED CSG RULES, WOULD THE UTILITY**
4 **ADMINISTRATIVE FEE APPLY TO ALL COMMUNITY SOLAR SUBSCRIBER**
5 **ORGANIZATIONS, INCLUDING THOSE WHO DO NOT CHOOSE NET**
6 **CREDITING CONSOLIDATED BILLING?**

7 **A.** Yes, the Utility Administrative Fee would be charged to all Subscriber Organizations
8 because the Utility Administrative Fee includes recovery of (i) the incremental costs of
9 CSG integration, (ii) costs to administer Subscriber Organization contracts, and (iii) the
10 costs associated with administering CSG billing credits, which, if adopted, would include
11 providing the Subscriber Organizations with the option of net crediting consolidated
12 billing.⁷

13 **Q. PLEASE SUMMARIZE HOW THE UTILITY ADMINISTRATIVE FEE WILL BE**
14 **APPLIED TO SUBSCRIBER ORGANIZATIONS, AND HOW OFTEN IT WILL**
15 **BE RE-EVALUATED.**

16 **A.** Under dual billing and net crediting consolidated billing, the Utility Administrative Fee
17 under the Proposed CSG Rules would be applied to Subscriber Organizations as a
18 percentage of each CSG facility's monthly sum of its Subscriber Allocated Credits, and

⁷ *Id.*

1 evaluated for potential revision on a twelve-month basis.⁸ The current CSG Rules did not
2 include a set timeline to evaluate, and possibly revise, the Utility Administrative Fee.

3 **Q. HOW WILL THE UTILITY ADMINISTRATIVE FEE BE BILLED TO THE**
4 **SUBSCRIBER ORGANIZATIONS?**

5 **A.** Under the Proposed CSG Rules net crediting consolidated billing option, the Utility
6 Administrative Fee would be deducted from the Subscriber Organization's portion of the
7 Allocated Credits. Under the dual billing option (which would not change from the status
8 quo under the Proposed CSG Rules), the Utility Administrative fee will be billed separately
9 to the Subscriber Organization.⁹

10 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR IDENTIFYING THE**
11 **COSTS INCLUDED IN THE UTILITY ADMINISTRATIVE FEE, INCLUDING**
12 **CONSOLIDATED BILLING COSTS?**

13 **A.** The revenue and expenses associated with the Utility Administrative Fee, including
14 consolidated billing costs, would be required under the Proposed CSG Rules to be
15 identified separately in general ledger records and maintained in separate revenue and
16 expense sub accounts.¹⁰ The Utility Administrative Fee would not include costs that are
17 already recovered from customers through other charges.

⁸ *Id.*

⁹ *Id.*

¹⁰ Proposed CSG Rules Para. VII G. (3) (4).

1 **Q. WHEN DO YOU EXPECT THE UTILITY ADMINISTRATIVE FEE TO BECOME**
2 **EFFECTIVE, AND WHAT DO YOU EXPECT THE STATUS OF THE**
3 **COMMUNITY SOLAR PROJECTS TO BE AT THAT TIME?**

4 **A.** I anticipate that the Utility Administrative Fee will become effective when the initial set of
5 CSG projects are out of the Construction Queue and become operational. The full
6 Application and Construction Queues and waitlist with 5 MW projects indicate that the
7 CSG project developers have or perceive business plans that support their CSG projects.
8 Also the CSG Rules provide a timeline that encourages progress from project application
9 through interconnection agreement and operation.

10 **Q. REGARDING HOW CHANGES MAY OCCUR TO THE CURRENT STATUS OF**
11 **CSG PROJECTS, PLEASE SUMMARIZE SOME OF THE TIMELINES IN THE**
12 **CSG RULES RELATED TO A CSG PROJECT'S APPLICATION PROCESS.**

13 **A.** In the Application Queue, the Subscriber Organization has 45 days from the date of receipt
14 of the initial engineering review response to agree in writing to commence the required
15 interconnection studies. Upon completion of required interconnection studies, the
16 Subscriber Organization has 90 days to execute an interconnection agreement and move
17 into construction Queue. If, within 18 months following execution of an interconnection
18 agreement, a CSG Facility fails to begin operating, the Subscriber Organization must
19 provide the Utility with an initial deposit of \$25 per kW for the project to remain in the
20 Construction Queue. If a CSG Facility fails to begin operating within 24 months of
21 executing an interconnection agreement, the Subscriber Organization must provide the

1 Utility with an additional deposit of \$25 per kW for the project to remain in the
2 Construction Queue.¹¹ This timeline provides that all CSG projects are treated fairly, and
3 that CSG projects should advance through the Queues to operational status without
4 significant delays, another reason to believe that CSG projects achieving operational status
5 will increase over time.

6 **Q. RECOGNIZING THAT THE NUMBER OF PROJECTS TO BECOME**
7 **OPERATIONAL FROM THE CONSTRUCTION QUEUE WILL INCREASE**
8 **OVER TIME, HOW DO THE PROPOSED CSG RULES PROVIDE FOR COST**
9 **RECOVERY OF THE UTILITY ADMINISTRATIVE FEE?**

10 **A.** The Proposed CSG Rules provide that recovery of the Utility's costs included in the Utility
11 Administrative Fee be accomplished through the following procedure: (i) an interim Utility
12 Administrative Fee at 3% of Allocated Credits will be set, applicable to all CSG facilities;
13 (ii) potential revisions to the interim Utility Administration Fee will occur every twelve
14 months thereafter; (iii) a six month evaluation will include a review of all current data, and
15 will provide the opportunity to resolve any cost issues raised by parties prior to the next
16 potential revision to the Utility Administrative Fee; (iv) in evaluating the operations of the
17 recently completed twelve-months, the balance of cumulative costs incurred in excess of
18 the proceeds from the interim Utility Administrative Fee will accrue in a regulatory asset

¹¹ CSG Rules Para. VII D. (8) (9).

1 subaccount at the Utility's before-tax Weighted Average Cost of Capital, that subaccount
2 having no impact on ratepayers.¹²

3 **Q. WHAT FACTORS ARE LISTED IN THE PROPOSED CSG RULES TO BE**
4 **CONSIDERED IN EACH RE-EVALUATION OF THE UTILITY**
5 **ADMINISTRATIVE FEE?**

6 **A.** Each subsequent revision to the Utility Administrative Fee will consider (a) the projected
7 amount of CSG subscribed kWhs available for the Allocated Credits, (b) a comparison of
8 actual proceeds received from the Utility Administrative Fee compared to the Utility
9 Administrative Fee revenue estimated at the previous twelve-month review; (c) an
10 amortization of the amount of unrecovered incremental costs accrued in the regulatory
11 asset subaccount. The regulatory asset amortization amount will be adjusted by the Council
12 as more data becomes available in subsequent twelve-month revisions to the Utility
13 Administrative Fee. The amortization amount will also be dependent on the Council's
14 decision regarding the amount of change to the interim Utility Administrative Fee.¹³

15 **Q. WITNESS BRUBAKER AND WITNESS WEMPLE EXPRESS CONCERN**
16 **REGARDING WHO WOULD PAY THE COSTS OF CONSOLIDATED BILLING**
17 **UNDER THE ADVISORS' PROPOSAL IF ONLY A SINGLE COMMUNITY**
18 **SOLAR PROJECT IS BUILT.¹⁴ DO YOU BELIEVE THIS IS A SIGNIFICANT**

¹² Proposed CSG Rules, VII. G. (5).

¹³ *Id.*

¹⁴ Affidavit of Maurice Brubaker, February 13, 2026, p. 2, at 9-11; Direct Testimony of Stephen B. Wemple, p. 13, Q. 16.

1 **RISK, AND IF THERE ARE INSUFFICIENT COMMUNITY SOLAR PROJECTS**
2 **TO ABSORB THE COST OF CONSOLIDATED BILLING, UNDER THE**
3 **ADVISORS' PROPOSAL, HOW WOULD THOSE COSTS BE PAID?**

- 4 **A.** I do not believe there is a significant risk that only a single CSG Project is built. As
5 expressed previously in my testimony, it is unreasonable to believe that the Community
6 Solar Program, which the Council has encouraged before 2018 with several Resolutions
7 and with the Application and Construction Queues filled to the capacity cap with a waiting
8 list, will fail dramatically with only one or a few CSG Projects. The Proposed CSG Rules¹⁵
9 provide for a periodic review and adjustment of the Utility Administration Fee, recognizing
10 an initial period of CSG projects becoming operational. I also note that the current CSG
11 Rules have included the recovery of Community Solar incremental costs from Subscriber
12 Organizations for several years prior to the consideration of consolidated billing, and the
13 Queues have been full under a dual billing framework. The Proposed CSG Rules are clear
14 that Subscriber Organizations bear the Community Solar incremental costs, and customer
15 protections have been in place and adequate for the Community Solar Program, including
16 consolidated billing. In the very unlikely event the Community Solar Program fails
17 entirely, ENO can seek cost recovery from ratepayers.

18
¹⁵ Proposed CSG Rules VII G. (5).

1 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR ENO TO RECOVER**
2 **THE COSTS OF THE COMMUNITY SOLAR PROGRAM THAT ARE NOT**
3 **INCLUDED IN THE UTILITY ADMINISTRATIVE FEE?**

4 **A.** The CSG Rules provide ENO with a fair opportunity to receive full and timely cost
5 recovery of costs incurred to implement and administer the Community Solar Program that
6 are not recovered through the Utility Administrative Fee, such as any non-reimbursed
7 portion of program bill credit costs and unsubscribed energy costs. Notably, the CSG Rules
8 do not provide for ENO to establish a separate surcharge fee or rate for recovery for the
9 Community Solar program costs not recovered through the Utility Administrative Fee.¹⁶
10 Rather, the specific mechanisms for recovery of these Community Solar program costs are
11 approved by a Council resolution based on the Council's review of the community solar
12 tariffs which are proposed in the Community Solar Plan required under CSG Rules Section
13 VII.A.1. Community Solar Program costs that are not included in the Utility Administrative
14 Fees are to be identified separately in ENO's general ledger records and maintained in
15 separate sub accounts.

16 **V. BENEFITS AND COSTS**

¹⁶ Proposed CSG Rules Para. VII G. (1) (2).

1 **Q. WITNESS WEMPLE STATES THAT CUSTOMERS MIGHT NOT**
2 **NECESSARILY BENEFIT FROM UTILITY CONSOLIDATED BILLING.¹⁷ DO**
3 **YOU AGREE?**

4 **A.** I do not agree. Subscriber/customers who voluntarily choose to participate in consolidated
5 billing should not experience difficulty understanding the bill as long as the cost and
6 calculation of the credit are consistent with the Proposed CSG Rules and the contractual
7 terms of the subscription. The Proposed CSG Rules provide for the option of dual billing
8 or consolidated billing, and for a Subscriber to choose either or both if subscribed to more
9 than one CSG project. For net crediting consolidated billing Subscribers, the bill will
10 include the Net Credit, as well as the associated information necessary to calculate the net
11 credit, including the Subscriber's pro rata portion of the monthly output of a CSG Facility,
12 CSG per kWh credit rate, and Guaranteed Savings Rate.¹⁸ For dual billing Subscribers, the
13 bill will include the Allocated Credit, as well as the associated information necessary to
14 calculate the Allocated Credit, including the Subscriber's pro rata portion of the monthly
15 output of a CSG Facility, and CSG per kWh credit rate.¹⁹

16 **Q. WITNESS WEMPLE STATES THAT NEITHER THE COUNCIL NOR THE**
17 **COMPANY IS PRIVY TO THE CONTRACT TERMS BETWEEN THE**
18 **SUBSCRIBER ORGANIZATION AND SUBSCRIBER, AND IT IS NOT**

¹⁷ Direct Testimony of Stephen B. Wemple, p. 11, Q. 12.

¹⁸ Proposed CSG Rules, Section VIII. F.

¹⁹ Proposed CSG Rules, Section VIII. G.

1 **GUARANTEED THAT UCB REQUIREMENTS LEAD TO SAVINGS FOR**
2 **COMMUNITY SOLAR SUBSCRIBERS COMPARED TO DUAL BILLING**
3 **ARRANGEMENTS.²⁰ DO YOU AGREE?**

4 **A.** I disagree. The current CSG Rules (VI.B.(3)) state that a Subscriber Organization shall
5 provide Subscription information for each Subscriber including a copy of the contract,
6 rates, fees, and terms and conditions to the Council upon request. Also, the Proposed CSG
7 Rules require that Subscriber Organizations are charged with the Utility Administrative
8 Fee, which would include consolidated billing costs (if adopted), whether or not
9 consolidated billing is used. Under net crediting consolidated billing and the Proposed CSG
10 Rules, the Subscriber is guaranteed a savings of 10%, 15%, or 20%. Witness Wemple also
11 refers to “the utility handling the billing, collections, and care functions”, to which it should
12 be noted that all such incremental costs related to Community Solar are recovered from
13 Subscriber Organizations under both dual billing and consolidated billing.

14 **Q.** **WITNESS WIMPLES STATES THAT CONSOLIDATED BILLING IMPOSES**
15 **SIGNIFICANT BURDENS ON THE UTILITY.²¹ DOES ENO HAVE AN**
16 **OPPORTUNITY TO RECOVER THE COSTS ASSOCIATED WITH THESE**
17 **BURDENS?**

²⁰ Direct Testimony of Stephen B. Wemple, p. 20, Q. 28.

²¹ Direct Testimony of Stephen B. Wemple, p. 12, Q. 14.

1 **A.** Both the existing and the Proposed CSG Rules provide ENO with a fair and timely cost
2 recovery of all costs incurred to implement, maintain and administer the Community Solar
3 Program, including the incremental costs associated with consolidated billing.²²
4 Specifically, the Community Solar incremental costs are recovered from Subscriber
5 Organizations.²³

6 **Q. WITNESS WEMPLE STATES THAT IMPLEMENTING UCB CREATES**
7 **CHALLENGES FOR THE UTILITY’S CALL CENTER.²⁴ HOW DO YOU**
8 **RESPOND?**

9 **A.** The utility call center will likely receive calls from dual billing Subscribers and
10 consolidated billing Subscribers related to Community Solar credit questions, since the
11 fluctuation in credits is primarily a function of the utility’s retail rate costs, affecting both
12 types of Community Solar billing.

13 **Q. WITNESS WEMPLE REFERS TO NOTABLE COMMUNITY SOLAR**
14 **REQUIREMENTS SET BY STATES, INCLUDING THE NYPSG SPECIFYING**
15 **THAT UNDER UCB, SUBSCRIBERS MUST RECEIVE AT LEAST 5% OF THE**
16 **BILL CREDITS. HOW DOES THAT REQUIREMENT COMPARE TO THE NET**

²² CSG Rules, VII. G. and Proposed CSG Rules, VII. G.

²³ CSG Rules, VII. G. (3) and Proposed CSG Rules, VII. G. (3).

²⁴ Direct Testimony of Stephen B. Wemple, p. 12, Q. 15.

1 **CREDITING CONSOLIDATED BILLING PROVISION UNDER THE**
2 **PROPOSED CSG RULES?**

3 **A.** The Proposed CSG Rules (VIII. B. (7)) require that the Subscriber Organization must
4 provide ENO with each Subscriber's Guaranteed Savings Rate of either 10%, 15%, or 20%.
5 All incremental Community Solar costs will be recovered from Subscriber Organizations.

6 **Q.** **WITNESS WEMPLE STATES THAT THE REQUIREMENTS OF SUPPLIERS**
7 **AND UTILITIES UNDER VERTICAL INTEGRATION AND COMPETITIVE**
8 **RETAIL SUPPLY DIFFER SIGNIFICANTLY AND SHOULD BE A CRITICAL**
9 **FACTOR CONSIDERED IN THE USE OF UCB, REFERRING TO ALASKA,**
10 **MINNESOTA, OREGON AND VERMONT AS VERTICALLY INTEGRATED**
11 **UTILITIES OFFERING UCB. HOW SHOULD THIS CONCERN RELATE TO**
12 **ENO AS A VERTICAL INTEGRATED UTILITY OFFERING CONSOLIDATED**
13 **BILLING?**

14 **A.** The recent actions in these four states has not revealed any meaningful controversy
15 regarding implementing consolidated billing, and it appears that there should be minimal
16 concern for the Council to consider consolidated billing with ENO as a vertically integrated
17 utility. The recent actions include a 2024 Senate Bill No. 152 with new Riders in Alaska;
18 Minnesota with an Administrative Fee and optional 10% Savings, and required compliance
19 filings in 2025; Oregon with a two tier net crediting consolidated billing framework for
20 three investor-owned utilities; and Vermont with a Green Mountain Power Program
21 encompassing 75% of the state with consolidated, simplified billing.

1

2 **VI. SUBSCRIPTION CREDITS**3 **Q. PLEASE SUMMARIZE THE ADVISORS' PROPOSED CHANGES TO THE CSG**
4 **RULES RELATED TO ENROLLING A SUBSCRIBER.**5 **A.** At least two months prior to when a subscription would take effect, a Subscriber
6 Organization must provide ENO with the Subscriber's name, service address, utility
7 account number, designation as either Low-Income or non-Low-Income, the Subscriber's
8 status as either dual billing or net crediting consolidated billing in conformity with the
9 Subscription contract, and the Subscriber's Guaranteed Savings Rate (10%, 15%, or 20%),
10 if applicable.²⁵ Note that an ENO customer can be a subscriber in more than one CSG
11 facility, in accordance with the CSG Rules, and each subscription can be either dual billing
12 or net crediting consolidated billing with a specified Guaranteed Saving Rate.13 **Q. PLEASE DESCRIBE A SUBSCRIBER ORGANIZATION'S MONTHLY REPORT**
14 **REQUIREMENTS RELATED TO SUBSCRIPTIONS.**15 **A.** Each month the Subscriber Organization for each CSG Facility will provide ENO a
16 monthly Subscriber report for each of its CSG Facilities, detailing each Subscriber's
17 percentage allocation of the CSG Facility output. This monthly report is the definitive
18 source of information to be used in calculating the Allocated Credits and, if applicable, Net

²⁵ Proposed CSG Rules VIII. B.

1 Credits for the monthly output of each CSG Facility.²⁶ If a Subscriber's Utility account is
2 closed, ENO will advise the Subscriber Organization, and the Subscriber will be removed
3 from the monthly Subscriber report for all CSG Facilities.²⁷

4 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR A SUBSCRIBER'S NET**
5 **CREDITS IN THE CASE OF A TEMPORARY DISCONNECTION FOR NON-**
6 **PAYMENT?**

7 **A.** In the case of temporary disconnection for non-payment, any Net Credits that a Subscriber
8 accrues during the disconnected period will appear on the next bill following
9 reconnection,²⁸ noting that Allocated Credits and Net Credits for each Subscription, as
10 appropriate, use the most recently updated monthly Subscriber report and CSG Facility
11 Output data on a two-month lag.²⁹

12 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR THE CASE WHERE**
13 **THE SUBSCRIBER ORGANIZATION HAS RECEIVED THEIR PORTION OF**
14 **THE ALLOCATED CREDITS FOR A MONTH, BUT THE SUBSCRIBER FAILS**
15 **TO PAY THEIR ELECTRIC UTILITY BILL IN FULL FOR THAT MONTH?**

16 **A.** In this case, ENO would debit on a future remittance to the Subscriber Organization an
17 amount equal to the Subscriber Organization's portion of the Allocated Credits for that

²⁶ Proposed CSG Rules VIII. C.

²⁷ *Id.*

²⁸ Proposed CSG Rules, VIII. C. (2).

²⁹ Proposed CSG Rules, VIII. E.

1 Subscriber for the month in which the Subscriber failed to pay their electric utility bill.
2 Following receipt of payment from a Subscriber for the total amount of the electric Utility
3 bill that was previously unpaid, ENO would reverse the debit on a future remittance to the
4 Subscriber Organization. If a future remittance to the Subscriber Organization is not
5 anticipated (such as when service to the customer has been terminated for non-payment),
6 ENO would bill the Subscriber Organization appropriately, to reflect the net effect of the
7 Subscriber's non-payment.³⁰

8 **VII. BILL PRESENTATIONS**

9 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR BILL PRESENTATION**
10 **RELATED TO NET CREDITING CONSOLIDATED BILLING SUBSCRIBERS**
11 **AND DUAL BILLING SUBSCRIBERS?**

12 **A** For net crediting consolidated billing Subscribers, the Net Credit would be shown on the
13 Subscriber's Utility bill as a single line item showing the Net Credit, along with the
14 associated information necessary to calculate the Net Credit – the Subscriber's pro rata
15 portion of the monthly output of a CSG Facility, CSG per kWh credit rate, and Guaranteed
16 Savings Rate.³¹

17 For dual billing Subscribers, the Allocated Credit would be shown on the Subscriber's
18 Utility bill as a single line item showing the Allocated Credit, along with the associated

³⁰ *Id.*

³¹ Proposed CSG Rules, VIII. F.

1 information necessary to calculate the Allocated Credit - the Subscriber's pro rata portion
2 of the monthly output of a CSG Facility and CSG per kWh credit rate.³²

3 For Subscriber Organizations with net crediting consolidated billing Subscribers, payments
4 to Subscriber Organizations of their portion of Allocated Credits shall be accompanied by
5 statements showing for each Subscriber the Guaranteed Savings Rate, monthly kWh
6 allocation of the CSG Facility Output, Allocated Credit, applied Net Credit, and the Utility
7 Administrative Fee.³³

8 **VIII. DISCONNECTION AND RECONNECTION**

9 **Q. HOW DO THE PROPOSED CSG RULES PROVIDE FOR SUBSCRIPTION FEES** 10 **AS RELATED TO DISCONNECTION AND RECONNECTION?**

11 **A.** ENO's disconnection and reconnection policies would only apply with respect to Utility
12 charges on a Subscriber's bill. Failure by the Subscriber to pay their Subscription Fee to
13 the Subscriber Organization (whether through dual billing or net crediting consolidated
14 billing) would not result in disconnection of the customer for nonpayment; neither shall
15 payment of the outstanding Subscription Fees be required to reconnect a Subscriber. All
16 revenues received by the Utility from Subscribers under net crediting consolidated billing
17 shall be applied first to Utility charges and second to the Subscriber's Subscription Fee.

³² Proposed CSG Rules, VIII. G.

³³ Proposed CSG Rules VIII. H.

1 **Q. OTHER THAN THE ABOVE PROPOSED CHANGES TO DISCONNECTION**
2 **AND RECONNECTION IN THE CSG RULES, HAVE THE ADVISORS**
3 **PROPOSED ANY ADDITIONAL CHANGES TO THE CSG RULES SECTION**
4 **XIII “CONSUMER PROTECTION & DISCLOSURE” TO ACCOMMODATE**
5 **CONSOLIDATED BILLING?**

6 **A.** No. The existing CSG Rules are sufficient to ensure customer protection and disclosure
7 provisions to accommodate consolidated billing.

8 **IX. UTILITY REPORTING REQUIREMENTS**

9 **Q. PLEASE DESCRIBE THE PROPOSED CHANGES TO THE CSG RULES**
10 **RELATED TO UTILITY REPORTING REQUIREMENTS, INCLUDING THOSE**
11 **RELATED TO CONSOLIDATED BILLING.**

12 **A.** By May 1 of each year, ENO is required to file an annual report with the Council on the
13 Status of the Community Solar Program, including: (1) monthly energy (MWh) and
14 capacity (MW) produced by the Community Solar Program, including each CSG Facility;
15 (2) monthly cost of energy and capacity ENO purchases through the Community Solar
16 Program, identifying bill credits separate from unsubscribed energy; (3) monthly \$/MW
17 and \$/MWh of the capacity and energy purchased; (4) Utility fixed and variable costs by
18 subaccount associated with administering the Community Solar Program; (5) Utility costs
19 by subaccount associated with administering the consolidated billing portion of community

1 solar; and (6) balance and activity of the regulatory asset subaccount, including
2 amortization, related to unrecovered consolidated billing costs.³⁴

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A.** Yes. However, I reserve the right to amend or revise my testimony based on additional
5 information, through discovery or otherwise, that may become available.

³⁴ CSG Rules Para. VII F. (2).