



UM 1930 Community Solar Program

Agent Subscription Model
Workshop
March 17, 2022

Who's Who

Hosts

Joe Abraham, Utility Analyst

Natascha Smith, Assistant Attorney, Oregon DOJ

Sarah Hall, Resource & Programs Development Manager

Presenters

Common Energy

Arcadia

Portland General Electric

Who's Who

Please introduce yourselves in chat.

Name and any organizational affiliation

Workshop Agenda

1. Common Energy Presentation and Q&A (1:10 – 1:45PM)
2. Arcadia Presentation and Q&A (1:45 – 2:20PM)
3. Portland General Electric Presentation and Q&A (2:20 – 2:40PM)
4. Staff Moderated Q&A (2:40 – 2:50PM)
5. Next Steps and Closing (2:50 – 2:55PM)

Operating Agreements

1. Be energy efficient: (Allow room for multiple perspectives. Leave time for everyone.)
2. Stay engaged (connected) without tripping the circuit breaker: (Don't overheat.)
3. Consider environmental conditions: (Mute when not speaking.)
4. Seek understanding: (Listen to understand, not to respond.)
5. Group Norms: (suggestions from participants)

Common Energy

Accelerating Clean Energy Adoption

Oregon Public Utility Commission

Docket No. UM 1930

Agent Subscription Model Workshop

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Introducing Common Energy

- Mission: Save money for electricity users by accelerating adoption of lower-cost clean energy from local sources
- Operating in 8 states and growing: IL, MA, MD, ME, MN, NJ, NY, OR
- Currently servicing >80 community solar projects (incl. Skyward project owned by SSI in OR), representing >200 MW and >20,000 subscribers
- Serving employees in partnership with Microsoft, VMware, Corning, LinkedIn, Bloomberg, and others to be announced
- Started in 2017 with proven energy-industry leadership team and distinguished board

Common Energy Supports Community Solar Success With Uniform Service Across States

- Common Energy's subscribers always save money at clearly-communicated discounts to bill credits
- Residential subscribers can cancel at any time at no charge
- 100% of Common Energy's revenue is from developers for providing services; no revenue is from subscribers
- Common Energy competes for subscribers
- Common Energy has invested in a subscriber experience to attract and retain subscribers

Common Energy's Standard Agency Model Enhances Subscribers' Experience

- Subscribers authorize Common Energy to provide a higher level of service as allowed by program rules
 - Enhanced monthly statements clearly indicate savings and positive environmental impact
 - Common Energy updates credit allocations from the solar farm to reflect decreases or increases in subscribers' electricity usage
 - Common Energy assigns subscribers to alternate solar farms if a solar farm is cancelled, delayed, or inoperable
 - Common Energy provides a personalized portal for each subscriber
- Enrolled subscribers continue to have access to information from the utility
 - On-line utility portal including utility electricity bills
 - Notices (e.g., safety, service interruption) continue to be delivered to subscribers

Benefits Of Common Energy's Agency Model

Service	Benefit to Subscriber
Enhanced monthly statements clearly indicate savings & positive environmental impact	Better understanding of value of community solar
Update credit allocations from the solar farm to reflect decreases or in increases in subscribers' electricity usage	Enhances savings for subscriber as electricity usage changes; avoids subscriber losses from over-delivery of bill credits
Assign subscribers to alternate solar farms if a solar farm is cancelled, delayed, or inoperable	Accelerates savings to subscribers; reduces confusion, mistrust, and administrative burden for subscribers
Personalized portal for each subscriber	Transparency and better understanding of value of community solar
Continued access to on-line utility portal including utility electricity bills	Transparency for subscribers who want details
Notices (e.g., safety, service interruption) continue to be delivered via communication preferences on file with the utility	Additional visibility for notices outside of routine monthly bills

In the public interest:

These benefits enhance value and reduce barriers for subscribers, and support the program's success, at no cost to subscribers or the state.

Planned Flow Of Common Energy Agency Service In Oregon

1. Common Energy receives approval from subscriber to provide service
2. Common Energy accesses subscriber's usage via customer's utility portal to determine appropriate allocation for subscriber
3. Common Energy completes utility enrollment protocol including allocation
4. On a monthly basis, Common Energy receives subscriber's utility statement via email from utility, confirms credits, and generates statement for subscriber
5. Common Energy automatically, electronically collects amounts owed from the subscriber
6. On behalf of subscriber, Common Energy remits to utility amounts owed
7. Utility remits amounts owed for credits to community solar farm owner

Differences In Oregon Vs Other States

- In OR, subscriber's utility statements can only be sent to one party
 - utility statements can be sent to more than one party in other states
- In OR, utility collects from subscriber amounts owed for credits
 - Common Energy collects amounts owed for credits in other states
- In OR, utility remits amounts owed for credits to solar project owner
 - Common Energy remits amounts owed for credits to solar project owner in other states

Common Energy Agency Model Delivers On Subscribers' Top Three "Wants" And "Don't Wants"

Subscribers' "wants"

1. Save money confidently
2. Have a positive environmental impact
3. Support the state economy

Subscribers' "don't wants"

1. Paperwork or extra steps
2. To spend time managing electricity
3. Complexity

Common Energy receives no revenue from subscribers who always save money and can cancel at any time without fee or penalty.

Recommendation To PUC

- Affirm enhanced service via agency model for all* consenting subscribers
- Require that utility bills can be sent to multiple parties according to electricity user preferences (independent of decision on agency model)
- Reduce paperwork and administrative burdens on subscribers; Especially, affirm that a subscriber does not need to sign a new disclosure if the solar farm providing their credits is changed (independent of decision on agency model)

* Including LMI. LMI subscribers should not be subject to discrimination that would make it harder for them to enroll and benefit from community solar.

Common Energy
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Thank You

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ARCADIA

Community Solar Program – Docket No. UM 1930

Use of Agent Subscription Model Workshop

March 17, 2022



**THE *POWER*
TO CLEAN UP
THE ENERGY
INDUSTRY.**





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Community Solar

Arcadia manages more than 600 MW in 8 states, serving more than 100,000 customers . We provide a comprehensive set of services for Project Managers.

Arcadia facilitates community solar by finding subscribers and managing all processes related to the subscribers' experience. Specifically in this regard, Arcadia:

- Markets community solar to potential customers;
- Provides all communications required by regulation;
- Enrolls subscribers in projects;
- Communicates allocation sizes to the utility;
- Checks that utility has accurately applied credits to subscribers' bills;
- Collects subscription fees from subscribers; and
- Transmits those fees to the community solar project



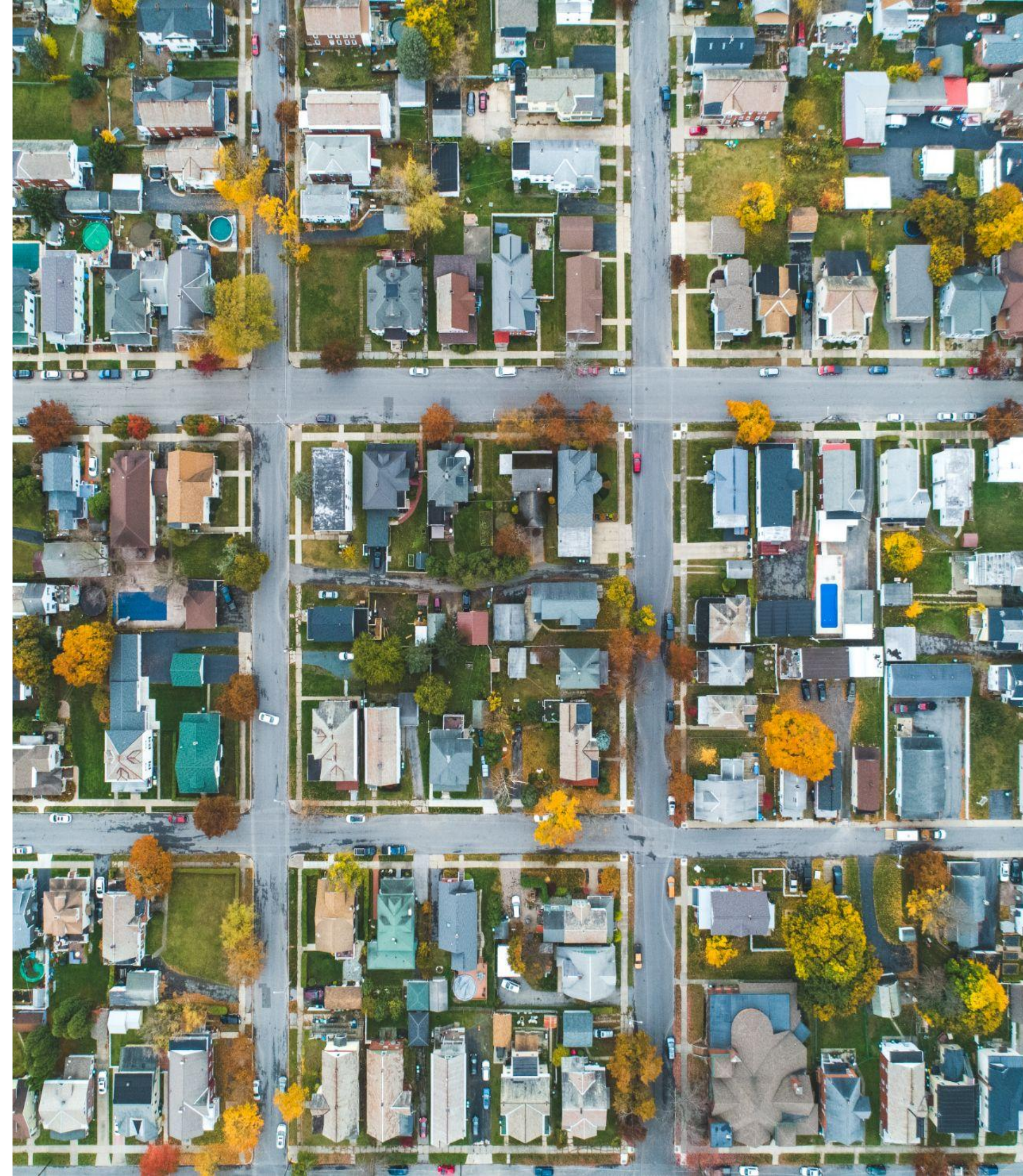
Customer Experience

We provide the best customer experience in the community solar market today.

Our customers get *guaranteed savings* with *no risk*.

Our projects are open to *everyone*, we do not require a *credit check* or *income verification*.

We are able to offer this product because of the software tools we have built, including data access and billing tools.



Why account access benefits the customer

Arcadia's software tools are driven by account access. The customer's bill and online account are the best source of information to provide community solar service.

- A customer's online account has detailed historic usage which helps to size their subscription appropriately.
- The bill allows Arcadia to see how credits are being applied for each customer.
- Without access to the bill our customers would suffer.
 - In other markets, we consistently see community solar credits being misapplied.
 - If we had to rely on the last bill, we would only be able to subscribe the customer at their most recent usage, which may lead to significant missed savings.

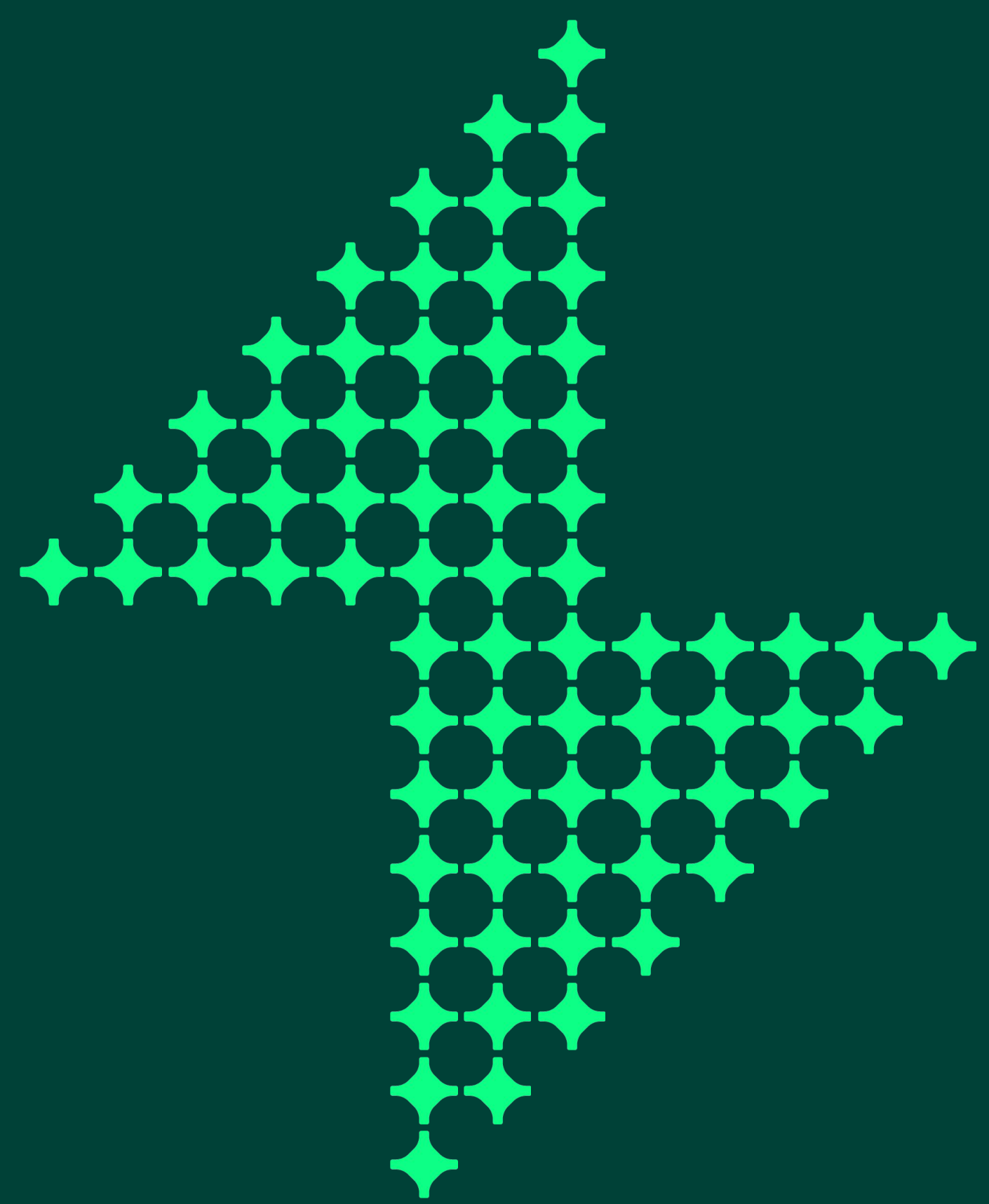
Arcadia's goal is to empower the customer with data and a true comprehension of community solar. The data we receive from a customer's account access ensures that we are able to provide customers with a deeper understanding of what their subscription to a community solar project actually means.

Arcadia's agreement with our customers

- All Arcadia customers sign [Arcadia's General Terms of Service](#) and Arcadia's CS Agency Agreement.
- Arcadia's customer agreement gives Arcadia the ability to:
 - Identify a customer as a subscriber for a community solar project
 - Sign a subscriber agreement on the customer's behalf
 - Manage certain utility customer account information
 - Access the customer's Arcadia account
 - Communicate with the utility on the customer's behalf
 - Pay the customer's bill
 - Communicate with a community solar project
 - Obtain marketing information from community solar developers
- Arcadia's actions on the utility account are determined by utility systems. For example, some utilities have set up their CIS in ways that require Arcadia to change all email addresses or login information.

Arcadia's impact on the customer's utility account

- Arcadia's customers always have access to their utility bill. We also forward every email from the utility to customers, so they receive all materials and information related to other utility programming.
- We have significant Intellectual Property related to proprietary payment processes, but we commit that every active Arcadia customer's bill is timely paid *in full*.
- We are also responsive to customer inquiries and complaints. Arcadia operates a customer experience team that responds to any questions from the subscribers to ensure they understand the impact their community solar subscription has on their energy bills and their community's power system.
- If a customer decides to close their Arcadia account or no longer wishes to pay their bill through Arcadia, we will return the member's personal email to the utility profile if possible or alert the customer to do so manually. There is no need to reestablish their online utility profile for their utility account.



QUESTIONS?

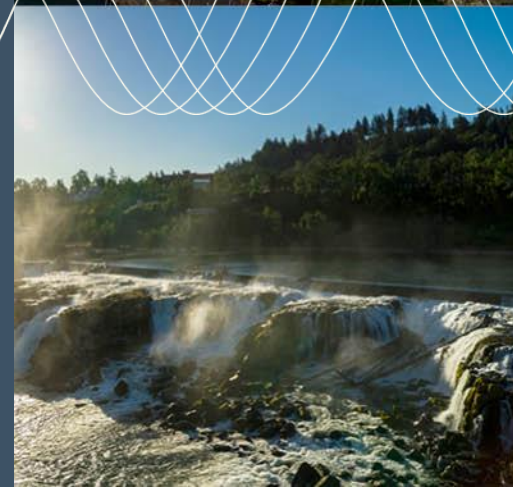
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Community Solar Program Workshop

Tess Jordan

March 17 2022



Topics We Will Cover

- CSP billing options
- Customer experience with unregulated, consolidated billing
- The electric bill ensures customer protections and access to critical information
- The bill promotes equitable access to programs
- Proceed with caution: lessons from other states
- Summary of concerns
- Recommendations



Billing options built into CSP design

CSP allows for two billing approaches:

- **Utility Bill**
 - Multiple pricing choices available to PM
 - Options for volumetric and capacity-based rates
- **Dual Bills (CSP 'Off-Bill' Option)**
 - Credit recorded on utility bill
 - PM bills customer for participation charges

Sample Portland General Electric Utility Bill – back

Details of this month's charges		Need help? We're here for you	
Meter # 21754689IN, Schedule 07		Online: portlandgeneral.com	
		Phone:	
Basic Charge	11.00	• Customer Service: 800-542-8818	
Energy Use Charge (796.000 kWh x \$0.05842)	46.50	• Outages and downed lines: 800-544-1795	
Transmission Charge (796.000 kWh x \$0.00206)	1.64	• Oregon Relay: (deaf, hard-of-hearing, blind-deaf, speech-disabled): 711	
Distribution Charge (796.000 kWh x \$0.04222)	33.61		
Subtotal - Energy Charges	92.75		
105 Regulatory Adjustments (796.000 kWh x \$-0.00011)	0.09 CR	Choose your way to pay	
109 Energy Efficiency Funding Adj (796.000 kWh x \$0.00337)	2.68	• Online*: portlandgeneral.com	
110 Energy Efficiency Customer Svc (796.000 kWh x \$0.00008)	0.06	• On the PGE mobile app* (download at your app store)	
112 Customer Engagement Transformation Adjustment (796.000 kWh x \$0.00021)	0.17	• Automated phone system*: 800-542-8818	
123 Decoupling Adjustment (796.000 kWh x \$-0.00037)	0.29 CR	• By mail to: (include bill stub)	
125 Annual Power Cost Update (796.000 kWh x \$0.0016)	1.27	P.O. Box 4438	
132 Federal Tax Reform Credit (796.000 kWh x \$-0.00151)	1.20 CR	Portland, OR 97208-4438	
135 Demand Response (796.000 kWh x \$0.00107)	0.85	• At Western Union or CheckFreePay locations	
136 Community Solar Cost Recovery (796.000 kWh x \$0.00006)	0.05	(find nearby locations at portlandgeneral.com/payinperson)	
137 Solar Payment Option Cost Recov (796.000 kWh x \$0.00044)	0.35	*24-hour options	
145 Boardman Decommissioning Adj (796.000 kWh x \$0.00022)	0.18		
Subtotal - Adjusting Schedules	4.03	Paying by check? When you pay by check, PGE will convert your check to an electronic debit.	
Oregon Commercial Activities Tax Recovery (0.436%)	0.42	Late payment: A late payment charge of 2.1% may be applied to past-due bills. If you're struggling to pay your bill, call us at 800-542-8818, or visit portlandgeneral.com. Enerov assistance may also be	
Subtotal - Other Charges/Credits	0.42		
City of Salem Tax (1.5%)	1.45		
Low Income Assistance	0.69		
Public Purpose Charge (3%)	2.90		
Subtotal - Taxes and Fees	5.04		
Current Energy Charges	102.24	1 Normal utility bill charges	
Community Solar Program			
APR 2020 Subscription Fee	68.88	3 Subscription fee	
APR 2020 Total Administration Fees	4.08	Public Utility Commission your basic bills, call customer service.	
APR 2020 Generation Credit (725 kWh x \$-0.11234)	81.45 CR		
Additional Charges/Credits	8.49 CR	2 Bill credits	
		Public Purpose Charge, renewable power programs, assistance to schools and low-income residents. Energy Trust of Oregon, Oregon Housing and Community Services Dept. and various education service districts administer the money.	
		4 Program fees	

If a Project Manager wishes to collect some or all participation payments directly (i.e. "off-bill"), including any partial or full up-front payments, a written justification and request must be submitted as part of the Pre-certification application process on the Program platform. (CSP PIM 3.11c)



Customer experience with unregulated, consolidated billing

- False marketing claims to customers from third party billing representatives
- Widespread customer confusion and concern
 - 180 calls to our Call Center
- Loss of customer access to utility account
- Loss of utility ability to contact the customer
 - Impact to public safety
 - Limits receipt of notices on late payment, outage restoration, flexible load events, energy usage thresholds exceeded
- Introduces auto pay as a criteria for program access



The electric bill ensures customer protections and access to critical information

- How to access help for bill payment, outages and downed lines
- Information on customer payment options: Budget Pay Plans, Equal Pay Plan, Time Payment Agreements, Credit Balance (per PGE Rule F)
- Disconnect notices (per OAR 860-021-0405)
- Details on how the bill is calculated and explanations of the billing components (per OAR 860-021-0120)
- Details on any late payment charge, rate + rationale (per OAR 860-021-0126)
- Details on City fees, taxes and other assessments (per OAR 860-022-0040)
- Twice annual appeals to support low-income energy assistance through donations to Oregon Energy Fund
- Data on energy use including daily average use, daily average weather, graphs of monthly energy use, and comparisons with that month the previous year (Per OAR 860-021-0120)
- Annual notice of customer rights and responsibilities
- Annual information on no-cost weatherization programs in English, Russian and Spanish
- Annual energy assistance options brochure in in English, Russian and Spanish
- Communication on Public Safety Power Shutoff awareness and preparedness
- Communication on the new Income Qualified Bill Discount program, and how to enroll



The bill promotes equitable access to programs

- Decarbonizing the grid will require greater communication with our customers.
- Bill inserts advertise opportunities to participate in demand side/flexible programs, electrification, and renewable energy options. These programs both implement Oregon environmental policy and offer customer bill savings.
- The bill provides customer feedback on program performance and itemizes program compensation/program cost.
- PGE provides annual notice of the Community Solar Program to all customers via a bill insert.



Proceed with caution: 'Supplier Consolidated Billing' in other states

- Many diverse companies are incentivized to take over the electric bill
- Authorized Supplier Consolidated Billing only exists in states with un/deregulated retail markets (e.g. TX, IL, MD)
- Commissions in several states have paused Supplier Consolidated Billing over consumer protections concerns:
 - Considered and not authorized in PA and DE
 - PUC staff recommended against pilot expansion in OH
- Regulatory implementation was heavily vetted and subjected to restrictions
 - Consumer protections, supplier certification, and supplier Code of Conduct
 - Treatment of delinquencies and non-payment
 - Equitable access



Summary of Concerns

- Eliminating regulatory oversight over customer communications means loss of consumer protection
 - Loss of utility contact with the customer compromises public safety
 - Customers lose access to information about support for vulnerable populations: bill assistance, no-cost weatherization, differentiated rates, etc.
 - Programs such as flexible load lose marketing ability, the ability to communicate performance and reward, and possibly the ability to alert customer to events.
-
- ✓ On Jan. 5, PGE sent a letter to the OPUC raising these issues
 - ✓ On Jan. 5, CUB sent a letter to the OPUC recommending suspension of unregulated billing programs in CSP due to serious concerns about (1) ensuring consumer protections and (2) effect on flexible load programs



Recommendations

1. Continue community solar program with established billing options.
2. PGE continues to be a willing partner in connecting customers with this opportunity, through the bill insert, our web page, and in conversations with our customers.
3. The Commission should ban unregulated consolidated billing within CSP
 - Timely direction is needed to protect customer experience and program access
 - UM 1930 is not the appropriate place for a broader investigation



Staff Moderated Q&A

- Please raise hand in Zoom
- Remain muted until we can get to you
- Ask questions in chat if you may be having audio issues

Next Steps

- Staff analysis of workshop findings
- Staff proposal posted to UM 1930 for public comment
- Staff recommendation for Commission at upcoming public meeting

Submitting Public Comments

- By email – PUC.FilingCenter@puc.oregon.gov Include “COMMENTS – DOCKET NO. UM 1930” in subject line
- By mail – Oregon Public Utility Commission, Attn: AR 654 Public Comment, PO Box 1088, Salem, OR 97308-1088
- By Phone – 503-378-6600 or 800-522-2404 or TTY 800-648-3458, weekdays from 8 a.m. - 5 p.m. Pacific Time

Thank You

Staff Contact

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