Date Filed: October 05, 2026

Witness: Rice, Brian J and Miller, Katerina
Request from: Public Utilities Regulatory Authority

Question:

Motion No. 32 Ruling, Aug. 13, 2026, Docket No. 24-08-03; Motion No. 5, Att. 2b, p. 36. Section 8.1.1 of the Program Manual states that, for Buy-All projects, the production meter and revenue meter may be the same meter. Would the EDCs recommend editing or removing this section to avoid future disputes like that discussed in Motion No. 32 in Docket No. 24-08-03?

Response:

The EDCs recommend editing, rather than removing, Section 8.1.1 of the Program Manual. Currently, Section 8.1.1 provides that, for Buy-All Projects, the Production Meter and Revenue Meter may be the same meter.

The EDCs propose revising Section 8.1.1 to clarify that, for Buy-All Projects, the Production Meter will also serve as the EDC Revenue Meter for purposes of associated billing. The EDCs further recommend expressly stating that the provision addresses the metering and billing configuration and is not an eligibility requirement.

The proposed revision is 8.1.1. Projects shall be equipped with a Production Meter to measure the amount of energy produced from Customer Projects, which will be located at or behind the EDC′s Delivery Point. In addition, there is a Revenue Meter that measures energy exports and imports to and from the distribution system. For Buy-All Projects, the Production Meter shall also serve as the EDC Revenue Meter for purposes of associated billing, and no separate Revenue Meter shall be required. This provision addresses the metering and billing configuration for Buy-All Projects and is not an eligibility requirement.

The EDCs believe this clarification would reduce the potential for Section 8.1.1 to be interpreted as establishing or modifying eligibility requirements, while retaining the provision to clearly describe the metering and billing arrangement applicable to Buy-All Projects.