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Request from: Public Utilities Regulatory Authority

Question:

Decision, Nov. 8, 2023, Docket No. 23-08-03, pp. 60-61. Discuss the rationale behind the EDCs' proposed modification to the definition of "Rooftop Project." Specifically, explain why the EDCs proposed that Rooftop Projects located on a set of rooftops must be served by the same revenue meter, rather than located on the same project site, as recommended by several stakeholders.

Response:

The EDCs' proposed modification to the definition of "Rooftop Project" was intended to address the ability of NRES projects to utilize available rooftop space while maintaining a clear relationship between the project and the applicable electric service and metering arrangement.

In the Year 3 proceeding, several stakeholders recommended expanding the definition to allow a project to utilize multiple rooftops located at the same Project Site. The stakeholders' comments included an example involving a site with six self-storage buildings and a single Revenue Meter, where the existing definition would have limited the ability to install an oversized system across the available rooftops. The Authority requested stakeholder input regarding whether the existing definition was consistent with the intent of Public Act 22-14.

The EDCs were open to a modified rooftop definition and proposed language that would permit a Rooftop Project to consist of either a single building rooftop or a set of rooftops served by the same Revenue Meter at the Project Site. The proposed requirement that multiple rooftops be served by the same Revenue Meter provided a clear electric-service boundary for treating multiple physical rooftops as a single Rooftop Project.

The EDCs proposed the common Revenue Meter requirement because it established an objective, readily verifiable, and administratively practical standard for determining whether multiple rooftops should be treated as a single Rooftop Project. Requiring a common Revenue Meter ensured that the rooftops were associated with the same electric-service and metering arrangement rather than solely sharing a common geographic location.

In contrast, allowing any collection of rooftops located on the same Project Site to qualify without regard to the applicable electric service could result in a Rooftop Project encompassing multiple, separately served facilities or customers. The common Revenue Meter requirement also reduced potential ambiguity associated with master-metered properties and other complex metering

configurations where multiple buildings may be located on the same Project Site but may not share the same electric-service relationship.

The Authority ultimately accepted the EDCs′ proposed redlines, allowing multiple rooftops at a Project Site served by a single Revenue Meter to be considered one Rooftop Project for purposes of system oversizing. The Authority concluded that the change would further the Program Objectives by facilitating utilization of available existing rooftop space for solar production.