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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, p. 3.
Confirm that, under the current program rules, there may be cases where a Rooftop Buy-All project consisting of a single rooftop is on a building served by multiple revenue meters. If so, does this create an inconsistent result where a project on a single rooftop may include multiple revenue meters in the underlying building, but a project across multiple rooftops must be behind a single revenue meter? Explain why or why not and discuss whether the EDCs would support an adjustment to the definition of "Rooftop Project" to allow projects to be installed on a set of rooftops located on the same project site.

Response:

The EDCs confirm that, under the current definition of "Rooftop Project," a project consisting of a single building rooftop may be eligible as a Rooftop Project without regard to whether the building is served by one or multiple Revenue Meters. Accordingly, there may be circumstances in which a single-rooftop Buy-All project is associated with a building having multiple Revenue Meters.

The EDCs do not view this as an inconsistency in the current definition. The two provisions address different project configurations. The definition permits a Rooftop Project where 100% of the Nameplate Capacity is installed on a single building rooftop, while a project installed on a set of rooftops must satisfy the additional requirement that the rooftops be served by the same Revenue Meter. The distinction was included in the EDCs' proposed revision to the definition in the Year 3 proceeding.

The EDCs also note that, for a Buy-All Project, the renewable generation facility is located in front of the customer Revenue Meter(s), and the project's production is measured through the Production Meter, which serves as the Revenue Meter for purposes of Program billing and settlement. As a result, the existence of multiple Revenue Meters serving the underlying building or project site for retail billing purposes does not necessarily mean that the Buy-All Project itself is measured or settled through multiple Revenue Meters. Accordingly, a single-rooftop Buy-All Project may be located on a building associated with multiple customer Revenue Meters while still utilizing a single meter for purposes of measuring project production and administering the Buy-All tariff.

As described in the Year 3 Decision, several stakeholders proposed expanding the definition to allow multiple rooftops at the same Project Site to be treated as a Rooftop Project. The EDCs supported an expansion but proposed limiting the multi-rooftop provision to a set of rooftops served by the same Revenue Meter. PURA accepted the EDCs′ proposed language and concluded that allowing multiple rooftops at a Project Site served by a single Revenue Meter would allow utilization of available rooftop space while furthering the Program Objectives.

The EDCs recognize that the current definition can produce different results depending upon whether a project is located on one rooftop or multiple rooftops. The EDCs would not oppose the Authority considering an adjustment to the definition to allow a set of rooftops located at the same Project Site to qualify without requiring that the rooftops be served by the same Revenue Meter. The EDCs recommend that any such revision clearly establish the applicable eligibility criteria and distinguish the physical location of the project from the electric service and metering arrangements associated with the site.