

**Virginia State Corporation Commission
eFiling CASE Document Cover Sheet**

191120226

Case Number (if already assigned)	PUR-2019-00182
Case Name (if known)	Ex Parte: In the matter concerning the implementation of a pilot program for municipal net energy metering
Document Type	CMNT
Document Description Summary	City of Alexandria Comments regarding PUR-2019-00182 Ex Parte: In the matter Concerning the implementation of a pilot program for municipal net energy metering
Total Number of Pages	3
Submission ID	17679
eFiling Date Stamp	11/15/2019 4:39:47PM



OFFICE OF THE CITY MANAGER
301 King St., Suite 3500
Alexandria, VA 22314

MARK B. JINKS
City Manager

703.746.4300
Fax: 703.838.6343

November 15, 2019

Joel H. Peck
Clerk
State Corporation Commission
c/o Document Control Center
P.O. Box 2118
Richmond, Virginia 23218-2118

Subject: City of Alexandria comments regarding PUR-2019-00182 *Ex Parte*: In the matter concerning the implementation of a pilot program for municipal net energy metering

Dear Mr. Peck:

The City of Alexandria hereby submits comments regarding State Corporation Case ("SCC") Case PUR-2019-00182 *Ex Parte: In the Matter Concerning of a Pilot Program for Municipal Net Energy Metering*. These comments reflect concerns the City of Alexandria has with regard to the Proposed Guidelines for implementation of a Municipal Excess Renewable Generation Pilot Program.

First, both Sections II. Term and IV.C. Applicability and Availability of the Proposed Guidelines do not provide for extension of the Pilot Program nor grandfather Pilot Program participants. Section §56-585.1:8(C) of the Code of Virginia (1950) as amended, explicitly articulates language providing for the grandfathering of pilot program participants.

Section 56-585.1:8(C) provides:

§56-585.1:8 (C). The duration of any pilot program approved by the Commission pursuant to this Section shall be six years. ***If the pilot program is not extended beyond such initial term, host and target accounts participating at the end of the initial term shall be permitted to continue to participate under the terms of the pilot program that existed during the initial term.*** The terms of the pilot program shall be included in future contracts for each municipality that elects to continue its program. [emphasis added]

Therefore, the Proposed Guidelines do not conform with the Code of Virginia section §56-585.1:8(C). The City of Alexandria respectfully requests the SCC amend the Proposed Guidelines to conform to Virginia Code Section §56-585.1:8(C).

191120226

Mr. Joel H. Peck
November 15, 2019
Page 2

Second, the City of Alexandria respectfully requests Section III.W. "Renewable Fuel Generator" should conform to the Code of Virginia (1950) as amended definition of renewable energy as defined in §56-576, not specifying just wind or solar power as the exclusive renewable fuel source. However, to accommodate for the spirit of the Pilot Program, the City of Alexandria suggests Section III. W "Renewable Fuel Generator" of the Proposed Guidelines include any renewable energy source as defined in §56-576 that is also subject to the definitions and certification process as detailed in the Green-e® Renewable Energy Standard for Canada and the United States¹ as published by the Center for Resource Solutions.

Third, Section VI. Billing and Payment of the Proposed Guidelines states, "The Utility will charge each Municipality for all administrative costs associated with implementing the Pilot Program, including administrative costs associated with crediting Excess Generation to Target Account(s)" See page 9 of the Proposed Guidelines. The City of Alexandria requests the SCC include the following:

- 1) A definition of Administrative Costs in Section III. Terms and Definitions. Such definition should outline reasonable administrative costs to be borne by a Municipality, including explicit limitations on Administrative Costs.
- 2) The word 'participating' be inserted prior to Municipality.
- 3) The word 'reasonable' be inserted prior to Administrative Costs. As of current, Administrative costs are not explicitly defined or limited in the Proposed Guidelines.
- 4) Language reflecting any reasonable Administrative Costs shall be subject to SCC review.
- 5) Language to permit the participating Municipality a mechanism to request a line-item reconciliation of reasonable Administrative Costs.

Fourth, the City of Alexandria respectfully requests the SCC amend Section IV. Renewable Energy Certificates of the Proposed Guidelines to read as follows:

IV. Renewable Energy Certificates

A. The Municipal Customer-Generator owns any RECs associated with the Renewable Generation Facility.

Section §56-585.1:8(C) of the Code of Virginia (1950) as amended, nor any other section of the Code of Virginia, imposes any restrictions or limitations on the ownership of Renewable Energy Certificates (RECs). As such, any such language in the Proposed Guidelines should be removed.

Fifth, the City of Alexandria respectfully requests the SCC amend Section VII. Reports to the General Assembly to read as follows:

¹ <https://www.green-e.org/docs/energy/Green-e%20Standard%20v3.3%20US.pdf>


VII. Reports to the General Assembly

The Utility shall submit a report to the General Assembly by December 1 of each year the Pilot Program is in effect, commencing in 2020, regarding the status of the Pilot Program's enrollment, to include at minimum number of Customers enrolled, amount of Excess Generation, number of Metered Account(s) and Target Account(s), aggregate amount of Bill Credits by Customer, number and type of Renewable Fuel Generator(s), Administrative Costs in aggregate and on average by Customer, and any other information the Utility deems appropriate.

As a final matter, the City of Alexandria notes that it was given only fifteen days to review and comment on the Proposed Guidelines which is also barely fifteen days before the SCC's adoption deadline of December 1, 2019. In fact, despite inquiries by City of Alexandria staff to Dominion Energy as early as June 2019 seeking to determine the status of the municipal net energy metering program, the City of Alexandria was never informed by the SCC Staff or Dominion Energy that the Proposed Guidelines were being developed or issued. As such, Dominion Energy and APCo – not the City of Alexandria, the Virginia Energy Purchasing Government Association ("VEPGA") for which Alexandria is a member, or any other interested parties – were given considerable influence in drafting the Proposed Guidelines despite the matter directly impacting municipalities such as the City of Alexandria. It is the City of Alexandria's perspective that such matters impacting municipalities should include their input and comments from the very beginning of the process as compared to the narrow period of time offered in this proceeding. As such, the City of Alexandria further supports comments submitted by VEPGA, through counsel, in this proceeding which reflect the City of Alexandria's concerns regarding the process to review and comment on the Proposed Guidelines.

The City of Alexandria appreciates the opportunity to submit comments reflecting its interests and expectations for the development of Proposed Guidelines for the implementation of a pilot program for municipal net energy metering. We stand ready to work with the SCC Staff and stakeholders to answer any questions or to contribute further work in developing and reviewing the pilot program's Proposed Guidelines.

Sincerely,



Mark B. Jinks
City Manager

cc: The Honorable Mayor and Members of City Council