VIRTUAL METER AGGREGATION

(The Other option for net metering)

What have you heard?

The language of net metering:

- Physical meter aggregation
- Virtual meter aggregation
- Customer-generator
- Host account/ Satellite account

“Meter aggregation may be completed through physical or virtual meter aggregation.”

52 Pa. Code § 75.12 (“Meter Aggregation”)

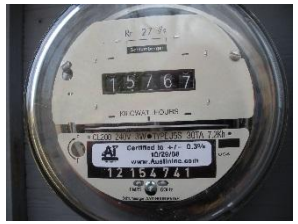
*Physical meter aggregation: "*The physical rewiring of all meters regardless of rate class on properties owned or leased and operated by a customer-generator to provide a single point of contact for a single meter to measure electric service for that customer-generator"

52 Pa. Code § 75.12

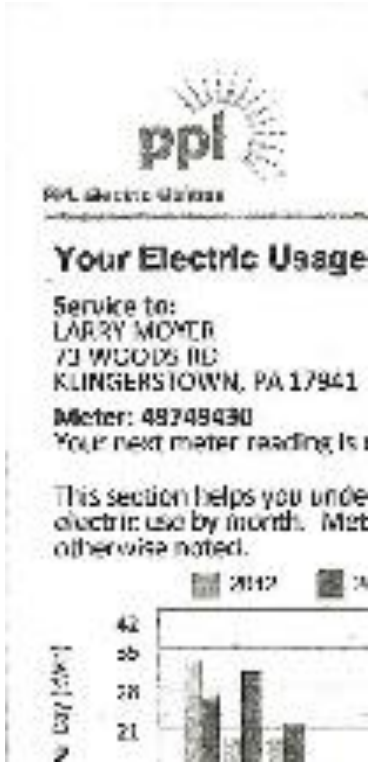
Physical meter Aggregation

Virtual meter aggregation: "The combination of readings and billing for all meters regardless of rate class on properties owned or leased and operated by a customer-generator by means of the EDC's billing process, rather than through physical rewiring of the customer-generator's property for a physical, single point of contact. . .

52 Pa. Code § 75.12



Virtual Meter Aggregation



“. . . the principal objective of the Act’s net metering provision is to provide incentives to small customer-generators to use alternative energy sources.”

PUC Final Rulemaking Order, entered June 23, 2006, page 12 - L-00050174

The basics of virtual metering:

- 2 meters
- Solar panels within 2 miles of house/shed/barn
- Monthly aggregation
- “Combination of readings and billing”

“Virtual meter aggregation . . . shall be <u>eligible</u> for net metering.”

“virtual meter aggregation” - 52 Pa. Code 75.12

“Virtual meter aggregation . . . shall be <u>allowed</u> for net metering.”

52 Pa. Code 75.14(e).

Who are the candidates for VM?

- Utility customers with houses and garages that are shaded
- Utility customers with poorly-oriented roofs
- Utility customers with acreage and “sunny patches”
- Utility customers with properties split by RR tracks, highways, rivers
- Utility customers who rent homes or apartments
- Utility customers who live in the country or in town

How does the cost compare to physical meter aggregation?

- How far from a point of interconnection?
- How many customer charges?
- How much “Incremental expense”

“The customer-generator shall be responsible only for any incremental expense entailed in processing his account on a virtual meter aggregation basis.” 75.14(e)

The controversy:

“Non-generational load”

“However, around May or June 2010, the Respondent determined that there was no non-generational load at the Complainant’s host account. This is a qualification for net metering.”

Initial Decision of the ALJ, January 23, 2013

PPL's position ----- March, 2015

"To qualify as a customer-generator eligible to participate in net metering, Mr. Moyer's alternative energy system must have ~~must have~~ load that is independent of the alternative energy system (often referred to as non-generational load)."

PPL Electric, in written testimony, March 6, 2015, p. 19

PUC’s Proposed Rulemaking Order

Docket # L-2014-2404361

Public Comments

May, 2015

OCA and DEP

Comments oppose the requirement for

“non-generational load”

PPL's position ------ May, 2015

"PPL Electric believes that applying the requirement for independent load to the host account is inconsistent with the purpose of virtual meter aggregation and would render virtual meter aggregation essentially meaningless"

(PPL Comments Regarding the "Advance Notice of Final Rulemaking Order", page 8, May 29, 2015)

What’s next?

The AEPS (Alternative Energy Portfolio Standards). . .

a new law ripe for legal challenges!!

Thank You!

Discussion?