**SUPPLEMENTAL DIRECT TESTIMONY OF**

**LEE EVANS AND LARRY LEGG**

**ON BEHALF OF**

**GEORGIA POWER COMPANY**

**DOCKET NO. 44280**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAMES, TITLES, AND BUSINESS ADDRESSES.**

A. Lee Evans, Director of Demand Planning & Analysis for Southern Company Services, Inc. (“SCS”). My business address is 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

A. Larry T. Legg, Director of Pricing and Rates for Georgia Power Company (“Georgia Power” or the “Company”), 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

**Q. MR. LEGG AND MR. EVANS, DID YOU PRESENT DIRECT TESTIMONY AND EXHIBITS ON BEHALF OF GEORGIA POWER IN THIS PROCEEDING?**

A. Yes.

**Q.** **ARE YOU PROVIDING ANY EXHIBITS TO YOUR TESTIMONY?**

A. Yes. Exhibit\_\_\_(LPE/LTL-1) provides a comparison of the cost shift for customers participating in the monthly netting pilot on a primarily volumetric base rate (for example, the Residential Service or “R” rate) versus a three-part base rate such as the Time of Use- Residential Demand rate (“TOU-RD,” otherwise known as “Smart Usage”).

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. Our testimony provides Georgia Power’s response to the August 5, 2022, Second Amended Procedural and Scheduling Order (“PSO”) issued in this proceeding by the Georgia Public Service Commission (“Commission”). The PSO is based on Commissioner Shaw’s motion in Georgia Power’s 2022 Integrated Resource Plan (“IRP”), ordering the Company to “address the appropriate structure and pricing of [the Company’s Renewable and Nonrenewable Resources (“RNR”) tariff] in the current rate case so that the Commission can move towards a fair and long-term way of addressing the issue.”

Our testimony demonstrates that based on the analysis of data from the monthly netting pilot, monthly netting excessively compensates monthly netting customers for the energy they push back onto the electric grid and in so doing, disproportionately shifts costs from participating to non-participating customers. Considering this analysis, the Company recommends that the Commission not expand the monthly netting pilot that it first authorized in the 2019 base rate case. Additionally, because a cost shift also occurs from instantaneous netting customers taking service under the R rate to non-participating customers, the Company recommends that the Commission require all customers who enroll in the RNR tariff on or after January 1, 2023 take service under a three-part rate,[[1]](#footnote-2) such as the Company’s TOU-RD or Smart Usage rate or an equivalent Commercial or Industrial rate. Finally, to protect customers from dishonest and misleading business practices in the marketplace for behind the meter (“BTM”) generation resources, the Company recommends that the Commission establish a formal framework for the Commission’s referral of consumer complaints to the Consumer Protection Division of the Georgia Attorney General’s Office.

**Q. PLEASE BRIEFLY DESCRIBE THE COMPANY’S RNR TARIFF.**

A. The Company designed the RNR tariff in 2002 in response to the Georgia Cogeneration and Distributed Generation Act of 2001 (“Cogen Act”), and the Commission approved the tariff in August 2002 (Order in Docket No. 15363). The RNR tariff, which is currently in its tenth version (“RNR-10”), establishes the terms and conditions by which the Company compensates customers with qualifying BTM generation resources for the energy they provide to the electric grid. Residential, commercial, and industrial customers take electric service under any of the Company’s rate plans for which they qualify, and additionally, enroll in the RNR tariff to be compensated for the energy they provide to the electric grid.[[2]](#footnote-3) The types of generation resources installed under the RNR tariff predominantly consist of rooftop solar generation installed behind the customer’s meter.

In the Company’s 2019 base rate case, the Commission ordered Georgia Power to implement a new payment methodology – monthly netting – under the RNR tariff and directed the Company to offer monthly netting on a pilot basis for the first 5,000 subscribers or until newly installed capacity reached 32 MW, whichever came first. The monthly netting pilot reached 5,000 participant applications and is now closed to new applicants. The Company’s longstanding instantaneous netting program remains open to new customer enrollments.

**Q. PLEASE DESCRIBE INSTANTANEOUS NETTING.**

A. Prior to the start of the monthly netting pilot in the 2019 base rate case, the Company exclusively offered instantaneous netting to customers under the RNR tariff. Under instantaneous netting, the Company credits the excess energy that a participating customer generates and pushes back to the grid at a value equal to the Company’s Solar Avoided Energy Cost, which is established under the Company’s Commission-approved Renewable Cost Benefit (“RCB”) Framework and filed annually with the Commission. With instantaneous netting, a BTM generation system first offsets the customer’s electricity use. Then, for each instant that a customer produces electricity in excess of its demand, the customer receives a bill credit for the energy pushed back to the grid valued at the Solar Avoided Energy Cost rate. These bill credits for excess generation are summed on a monthly basis and an aggregate credit is reflected on the customer’s monthly electric bill, thereby lowering the customer’s overall bill.

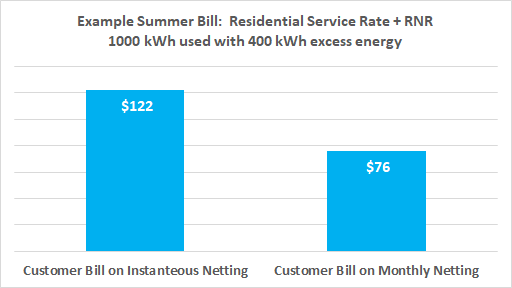
By way of example, a customer participating in instantaneous netting with a rooftop solar generation system that delivers 400 kWh of energy back to the grid during the month would receive a bill credit in the amount of $10.71. This credit represents the amount of excess energy delivered to the system – 400 kWh – multiplied by the current Solar Avoided Energy Cost rate of just under 3 cents per kWh.[[3]](#footnote-4) Again, the monthly credit to the customer’s bill is in addition to the benefit the customer receives from reducing their energy purchases by supplying some of their energy needs from their BTM generation system.

**Q.** **PLEASE DESCRIBE MONTHLY NETTING.**

A. Under monthly netting, the Company *subtracts* the total amount of energy a participating customer delivers to the grid from the total amount of energy the customer purchased from Georgia Power during a bill period. Monthly netting compensates the customer for the excess energy they deliver to the grid at the full volumetric portion of the retail electric rate the customer pays to Georgia Power, which substantially overpays the customer for the energy it delivers to the grid. This substantial overpayment disproportionately shifts costs from participating to non-participating customers.

For example, assume a customer on the R rate, who averages 1,000 kWh of monthly consumption, has a rooftop solar generation system delivering 400 kWh of energy back to the grid. Unlike the instantaneous netting customer in the previous example, the monthly netting customer does not pay for the full 1,000 kWh of energy that the Company delivers to that customer during the billing period. Instead, the monthly netting customer’s excess energy (400 kWh) reduces what the customer pays for their actual monthly consumption from 1,000 kWh to 600 kWh (1,000 kWh – 400 kWh). The Company would then bill the monthly netting customer for only 600 kWh on the retail rate. Figure 1 below further illustrates the difference in how the monthly and instantaneous netting methodologies compensate customers for the excess energy they provide to the grid.

**FIGURE 1**



As the example above demonstrates, a customer participating in the monthly netting pilot pays *substantially less* for the same electric service than a customer participating in instantaneous netting, despite that both scenarios assume the same monthly usage (1000 kWh) and provide the same amount of excess energy (400 kWh) back to the grid. Because Georgia Power recovers its full cost of service through established revenue requirements, monthly netting shifts the costs that are not recovered from the monthly netting customer to non-participating customers. This cost shift creates an unjustified and disproportionate subsidy that only benefits the customer participating in the monthly netting pilot.

**Q.** **IN LIGHT OF THE ABOVE, WHAT ARE THE COMPANY’S RECOMMENDATIONS?**

A. This case represents the first opportunity for the Commission to evaluate the results of the monthly netting pilot since its adoption in the 2019 base rate case. The Company recognizes the benefits that BTM renewable energy resources provide to the Company’s system. However, the Company requests the Commission balance these benefits with the costs shifted to all other non-participating customers under the predominant volumetric rate structure. The Company does not recommend continuing to subsidize BTM solar customers at the expense of other customers by using the monthly netting methodology combined with volumetric rate structures.

Independent of the monthly netting pilot, Georgia Power has seen a rapid increase in renewable energy development. This growth stems from this Commission’s measured and deliberate approach to procuring and incentivizing renewable energy resources in Georgia. This rapid growth demonstrates that the Commission’s existing programs are working as intended, particularly as renewable resources become even more cost competitive as a result of further technological maturation and the generous incentives that the recent federal Inflation Reduction Act (“IRA”) provides.

In developing a holistic approach to Georgia Power’s other renewable energy programs under the IRP process, the Company has identified several core principles that equally apply to the RNR tariff, which include ensuring customer fairness by minimizing cross subsidization and appropriately valuing the costs and benefits of renewable energy. This holistic approach, together with the continued refinement of the Company’s RCB Framework, will appropriately and fairly compensate customer generation in a way that encourages the development of BTM resources while also protecting non-participating customers from cost-shifting.

In response to the Commission’s PSO, the Company:

* Opposes expansion of the RNR monthly netting pilot because it results in significant subsidization to customers participating in the pilot while disproportionately shifting costs to non-participating customers;
* Recommends requiring all customers who enroll in RNR on or after January 1, 2023, to take service under a three-part rate, such as the Company’s TOU-RD rate or an equivalent Commercial or Industrial rate, to mitigate the disproportionate cost shift to non-participating customers; and
* Recommends the development of a formal framework for the Commission’s referral of consumer complaints to the Consumer Protection Division of the Georgia Attorney General’s Office to help protect customers from dishonest and misleading business practices in the marketplace for BTM generation resources, which appear to have increased in frequency since the start of the monthly netting pilot.

As we explain in this testimony, given the sustained growth of BTM solar resources in Georgia under the existing RNR tariff structure and the expected effect of new incentives resulting from the federal IRA, the Commission does not need to further expand BTM incentives at this time, particularly at the expense of homeowners and businesses that are unable or unwilling to install BTM resources. The compensation rate paid to RNR monthly netting customers—almost the Company’s full retail rate of electricity—worsens a cost shift already present under instantaneous netting. The compensation rate paid to RNR monthly netting customers significantly exceeds the rate the Company otherwise pays for renewable energy and instead compensates participants for utility services they are not providing—such as the costs incurred for delivering that electricity, which includes capital costs and reasonable and necessary operating expenses. The Company is then left to recover these unrecovered costs from non-participating customers.

**II. RNR TARIFF AND RATE DESIGN**

**Q. PLEASE DESCRIBE THE HISTORY OF THE RNR TARIFF.**

A. Georgia Power designed and implemented the RNR tariff as its customer offering to comply with the requirements of the Cogen Act and the federal Public Utility Regulatory Policies Act (“PURPA”). Georgia Power introduced the RNR tariff in 2002 and the Commission originally approved it in its August 22, 2002 Order in Docket No. 15363.

**Q.** **CAN YOU PLEASE DESCRIBE THE COMPANY’S APPROACH TO INTEGRATING BTM RESOURCES?**

A. The Company’s longstanding approach to successfully integrating BTM resources under the RNR tariff has been to develop an equitable rate design that encourages the development of BTM resources while ensuring that the costs associated with operating the Company’s electric system continue to be fairly recovered among its customers based upon appropriate cost causation principles. Following the enactment of the Cogen Act in 2001, the Company’s approach has relied upon the instantaneous netting approach currently reflected in the Company’s RNR tariff. Under instantaneous netting, participating customers can offset their own consumption of electricity while also receiving compensation for excess energy they deliver to the Company’s electric system at a rate that reflects the Commission-approved value of solar energy—a value derived from the Company’s RCB Framework. Conversely, under the monthly netting pilot approved in the 2019 base rate case, the Company must compensate monthly netting customers for the energy generated by the customer’s BTM generation system at the full volumetric portion of the Company’s retail electric service rate.

The current monthly netting methodology significantly overpays customers for the energy they deliver, whereas instantaneous netting better follows established cost causation principles that more appropriately compensate participating customers for the excess generation they provide to the grid. For this reason, the Company’s consistent and appropriate solution to integrating BTM resources has been to pay for this excess generation pushed to the grid under an instantaneous rather than monthly netting methodology. As compared to monthly netting, this approach strikes a better balance between incentivizing BTM resources and protecting non-participating customers from the additional cost shift associated with monthly netting. However, as we discussin the remainder of our testimony, even the instantaneous netting approach can cause disproportionate cost shifts that require appropriate rate design to mitigate.

**Q.** **DOES THE COMPANY’S RETAIL BASE RATE INCLUDE COST COMPONENTS BEYOND JUST THE VALUE OF THE ENERGY DELIVERED?**

A. Yes. The Company’s retail rates are designed to recover various costs that the Company must incur to serve customers, such as generation, transmission, and distribution capacity, as well as other costs, like metering, billing, and customer service support. Although some tariffs include individual pricing components for customer-, energy-, and demand-related costs, for other tariffs the demand-related costs are recovered through the energy price. For example, under any rate that primarily relies upon volumetric energy charges, such as the R rate, the actual cost of energy is only a small percentage of the overall retail base rate. As Mr. Evans explained in his Direct Testimony filed in this proceeding, the Company’s cost allocation methodology seeks to apportion respective costs into three primary classifications – demand-related, energy-related and customer-related. These cost classifications can be descried as follows:

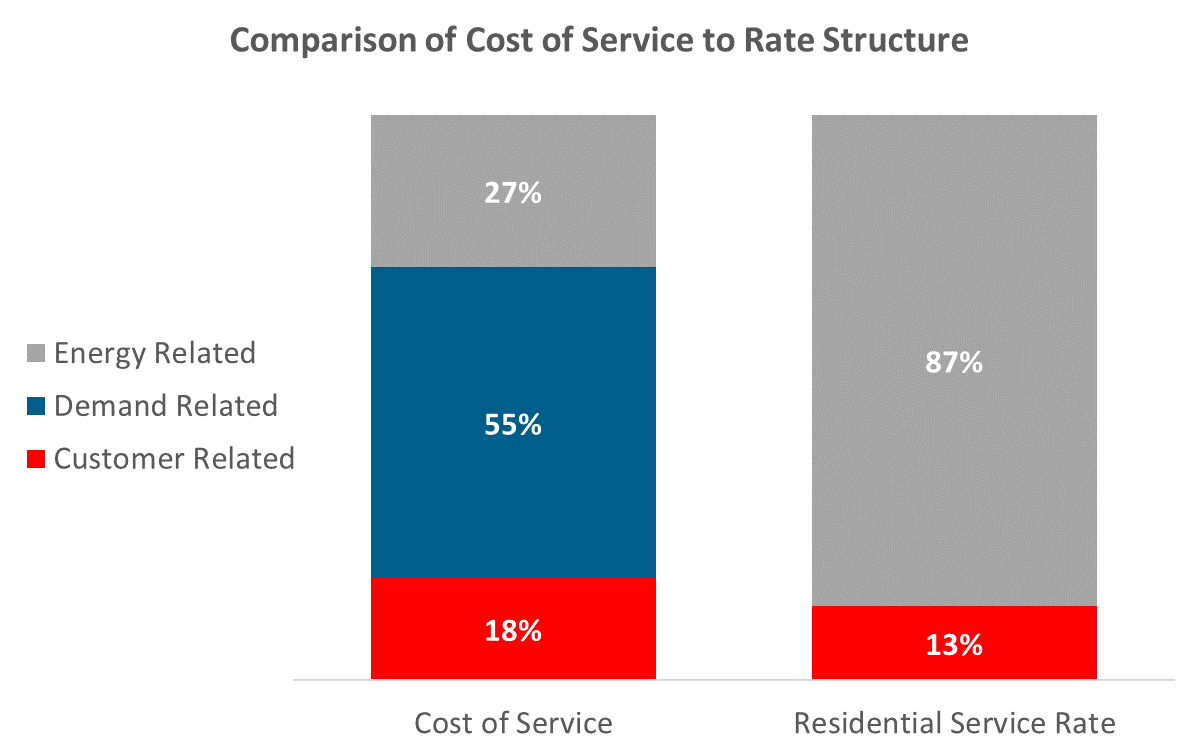
(1) ***Demand-related*** costs are incurred to serve customers’ peak requirements for electricity. This generally refers to costs incurred by the Company to provide the capacity necessary to serve the customers’ peak kilowatt loads (demands) throughout the year. Examples of demand-related costs include costs associated with generation, transmission, and portions of distribution investments and associated expenses.

(2) ***Energy-related*** costs vary with the amount of energy the customer consumes. These costs comprise primarily production fuel and variable operations and maintenance (“VO&M”) expenses, which vary with the kilowatt-hours consumed by the customer.

(3) ***Customer-related*** costs are associated with establishing service to customers but are independent of customers’ kW and kWh consumption. This classification generally refers to the costs the Company incurs to attach a customer to the distribution system and be ready to serve that customer, and for customer metering, customer billing, and certain administrative costs.

As the chart below demonstrates, the bill for customers taking service on the R rate is overwhelmingly made up of volumetric energy charges. Because this rate does not include a large enough monthly customer charge and has no demand charge, all or portions of demand-related costs are collected through the energy charge. Therefore, when monthly netting compensates customers at the volumetric energy rate for the excess energy pushed back to the grid, the Company is crediting them for fixed customer and demand related services they are still using. See Figure 2 below.

**FIGURE 2**



Notably, a customer participating under the RNR tariff is likely not providing *any* immediate demand- or customer-related services when they deliver energy back onto the grid. Instead, they are only providing and offsetting the cost of the energy. The amount the Company pays to BTM customers should reflect the value of the energy being pushed back onto the grid and nothing more. Without this change, the Company is overcompensating participating customers and other customers are shouldering the additional cost.

**Q.** **WHAT OCCURS WHEN THE COMPANY COMPENSATES A CUSTOMER AT THE RETAIL RATE UNDER MONTHLY NETTING?**

A. When a customer enrolls in monthly netting and is compensated at the prevailing retail rate, that customer sheds or “shifts” cost recovery to all other customers. Compensating a customer for intermittent energy they deliver to the grid at the retail rate allows these customers to avoid paying their proportional share of the costs to build, operate, and maintain the system. In certain situations where fixed costs are recovered entirely through variable volumetric charges, monthly netting can result in a customer paying less than the actual fixed costs the Company incurs to serve that customer. For a monthly netting customer on the R rate, the Company has calculated the resulting shift in cost to be approximately $1,356 per year for the average monthly netting participant.

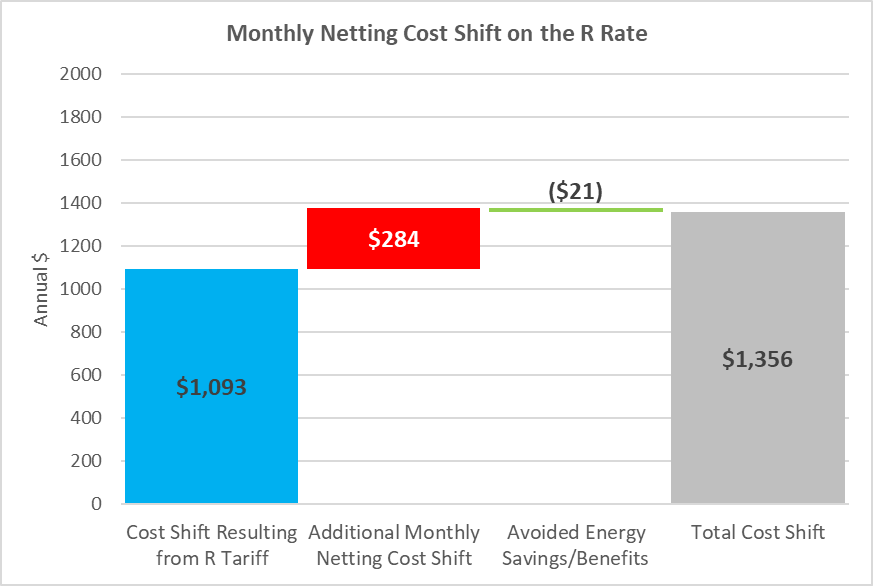
**Q.** **WHAT IS THE ANNUAL COST SHIFT RESULTING FROM THE MONTHLY NET METERING PILOT?**

A. In addition to the cost shift resulting generally from BTM solar, the monthly netting pilot results in an annual cost shift of $1.4 million. As Mr. Legg identified in his Direct Testimony filed in this proceeding, to address this cost shift, the Company has made an adjustment of approximately $1.4 million to rates related to the projected cost shift from the monthly netting pilot. All customers will pay for this adjustment, including customers who do not have BTM generation.

**Q. DOES THE COMPANY HAVE DATA BASED ON THE MONTHLY NETTING PILOT TO DEMONSTRATE THIS COST SHIFT?**

A. Yes. The Company has reviewed the load profiles of residential customers enrolled in the monthly netting pilot with at least twelve months of participation and accounted for the installed behind the meter solar capacity. Using this data, the Company formed before-solar and after-solar loadshapes for participants in order to calculate the cost shift that occurs with monthly netting. The Company utilized these same inputs to calculate the instantaneous netting cost shift. Figure 3 below illustrates the incremental levels of cost shift associated with an average pilot participant receiving service under the R rate who is enrolled in instantaneous netting and a residential customer on the R rate who is enrolled in monthly netting.

**FIGURE 3**



As shown in Figure 3 above, although a significant cost shift already exists when customers install BTM solar due to the volumetric design of the R rate, the monthly netting pilot exacerbates this cost shift.

**Q. DOES THE COMPANY’S ANALYSIS FOCUS PRIMARILY ON RESIDENTIAL CUSTOMERS?**

A. Yes. The Company’s analysis to date has focused on residential customers primarily on the R rate. 74% of Georgia Power’s residential customers are on the R rate, and 84% of the RNR monthly netting pilot customers are on the R rate. Although commercial and industrial customers are also eligible for the RNR tariff, the Company has not reviewed the cost shifts presented by those customer classes and prevailing rates due to the relatively small population of non-residential customers currently enrolled in RNR monthly netting. Although the residential R rate provides the best “apples to apples” comparison by providing the Company with the largest data set, the principles and trends identified in the residential analysis are likely to carry over to commercial and industrial customers receiving service under volumetric energy rates.

**Q. THE COMPANY HAS IDENTIFIED A DISPROPORTIONATE COST SHIFT ASSOCIATED WITH MONTHLY NETTING, BUT HAS IT ATTEMPTED TO QUANTIFY THE BENEFITS?**

A. Yes. Under monthly netting, as with instantaneous netting, the Company avoids the incremental costs of fuel and generation variable operations and maintenance expenses. Currently, RNR customers do not offset any existing transmission and distribution costs.

**Q. DOES A MONTHLY NETTING CUSTOMER STILL UTILIZE THE COMPANY’S ELECTRIC SYSTEM?**

A. Yes. Monthly netting customers rely on the full capacity of the electric system in two critical ways: first, to receive energy from the electric system when their BTM system is not fully offsetting their energy usage, and second, to export energy generated by their BTM system to the grid. With this in mind, the practice of monthly netting is merely an accounting construct that allows the customer to bank its excess generation for future use. The reality, however, is the grid does not physically store the excess electricity produced and supplied to the grid by the customer. When the monthly netting customer exports power in excess of its onsite load, the energy must be immediately utilized elsewhere on the system and cannot be banked for later use. This happens even though monthly netting pays for this delivered power as if this banking were physically possible.

**Q.** **IS THE COMPANY RECOMMENDING THAT THE COMMISSION CONSIDER OTHER POLICY OPTIONS?**

A. Yes. The Company recommends the Commission consider three-part rates as a solution to the disproportionate cost shift occurring today by requiring all customers who enroll in RNR on or after January 1, 2023 to take service under a three-part rate. Such rates better align with the Company’s underlying costs, and further mitigate the cost shift between participating and non-participating customers. As shown in Exhibit\_\_\_(LPE/LTL-1), broader adoption of three-part rates, such as the Company’s TOU-RD rate, would significantly reduce the cost shift currently associated with the misalignment of BTM customer generators on primarily volumetric rates, such as the residential R rate.

**Q.** **HAS THE COMPANY PREVIOUSLY RECOMMENDED ADOPTION OF A RESIDENTIAL DEMAND RATE TO MITIGATE DISPROPORTIONATE COST SHIFTS FROM BTM CUSTOMER INSTALLATIONS?**

A. Yes. When the Company introduced the TOU-RD tariff in the 2013 rate case, it was presented as a complement to the then-proposed Supplemental Power Service (“SPS”) tariff. At that time, to avoid cost shifts between customers with BTM generation and those without, the Company proposed that a residential BTM customer generator either participate on a demand rate like TOU-RD or remain on the residential R rate and pay an additional flat monthly capacity charge. As stated in Witness Roberts’ testimony from the 2013 base rate case, the TOU-RD tariff was designed to be (i) revenue neutral to the standard residential tariff, (ii) provide “residential customers with a demand rate option to satisfy the requirement of SPS,” and (iii) approximate energy credits at the Company’s avoided cost and provide capacity credits for reductions in peak demands provided by the customers’ BTM generation. Since the inception of TOU-RD, the Company has supported the use of demand rates with time of use components to mitigate cost shifts from customers with BTM generation to those customers without. As the Company, this Commission, and the market embraces the growth in BTM customer generation, Georgia Power recommends the Commission again consider the Company’s arguments in support of transitioning customers with BTM generation to three-part rates.

**Q.** **IF THE COMMISSION ADOPTS THE COMPANY’S RECOMMENDATION TO ENROLL NEW RNR CUSTOMERS IN A THREE-PART RATE, WHAT WILL HAPPEN TO EXISTING RNR CUSTOMERS WHO ARE NOT CURRENTLY ON A THREE-PART RATE?**

A. Assuming the monthly netting pilot remains capped at 5,000 customers, the Company’s proposal is to move all *future* RNR customers to a three-part rate, such as the TOU-RD/Smart Usage rate or an equivalent Commercial or Industrial rate. If adopted, this change would apply to all customers who enroll in RNR on or after January 1, 2023. Additional policy questions for the Commission are:

1. Whether and for how long existing RNR customers, including the 5,000 monthly netting pilot customers, should be allowed to remain on a rate other than a three-part rate (i.e., TOU-RD/Smart Usage) or an equivalent Commercial or Industrial rate.
2. Whether and for how long the 5,000 monthly netting pilot customers should continue to be compensated under monthly as opposed to instantaneous netting. For example, the Commission could consider allowing the 5,000 monthly netting pilot customers to continue monthly netting for a time period sufficient to recover their investment in their BTM generation system.

The purpose of the Company’s proposal is to help ensure that, going forward, the disproportionate cost shift between customers with BTM generation and non-participating customers is minimized to the greatest extent possible. With this in mind, the Company and the Commission can also continue to address the appropriate rate structures for BTM customers in future regulatory cycles.

**III. BTM SOLAR MARKETPLACE AND CONSUMER PROTECTIONS**

**Q. HOW WOULD YOU DESCRIBE THE CURRENT BTM SOLAR MARKET IN THE COMPANY'S SERVICE TERRITORY?**

A. The Company has experienced robust and continued growth in the BTM market, as demonstrated by increasing enrollments in the Company’s RNR tariff. This steady growth has continued notwithstanding the full subscription of the monthly netting pilot. In fact, BTM project applications in 2022 are on pace to equal or exceed the volume experienced in 2020 and 2021. This steady and consistent growth shows that BTM development in Georgia remains strong and that monthly netting is not necessary to encourage rooftop solar adoption in Georgia.

Considering the recent passage of the federal IRA, demand for BTM generation is likely to continue and we will likely see a further increase in the number of applications received under the RNR tariff regardless of any further extension of the monthly netting pilot. With this expected increase in demand, there is no need to further incentivize the BTM transition through additional rate design programs such as an expanded monthly netting program.

**Q. DO YOU HAVE ANY ADDITIONAL CONCERNS ABOUT THE ROOFTOP SOLAR MARKET IN GEORGIA?**

A. Yes. The Company is aware of unethical business practices employed by some solar marketers, lead generators, solar installers, and solar loan providers offering services to Georgia Power’s BTM customers. Unlike some other states dealing with this issue, the state of Georgia does not yet have a certification requirement to ensure that BTM service providers have the expertise and financial capability to serve customers. Increasing the incentives for BTM resources without additional oversight of BTM service providers invites potentially more unqualified actors and additional customer complaints. Therefore, the Company supports the development of a more formal framework for the Commission’s referral of consumer complaints to the Consumer Protection Division of the Georgia Attorney General’s Office. Georgia Power’s customers are at the center of everything we do, and it would be a disservice to our customers and the continued growth of rooftop solar in Georgia for customers to be taken advantage of through unfair and deceptive business practices.

**IV. CONCLUSION**

**Q.** **PLEASE SUMMARIZE THE COMPANY’S RECOMMENDATIONS.**

A. As the Company’s analysis of the monthly netting pilot demonstrates, monthly netting disproportionately shifts costs from RNR monthly netting customers to non-participating customers. The Company recommends that the monthly netting pilot remain capped at 5,000 customers. Additionally, given the cost shifts also inherent in the Company’s instantaneous netting program, the Company recommends that the Commission require all customers who enroll in the RNR tariff on or after January 1, 2023, to take service under a three-part rate, such as the Company’s TOU-RD rate, to mitigate the disproportionate cost shift to non-participating customers. These recommendations appropriately balance the need to protect non-participating customers while continuing to support the rapid adoption and growth of BTM resources. Finally, to protect customers from dishonest and misleading business practices in the BTM marketplace, the Company requests that the Commission establish a more formal framework for the Commission’s referral of consumer complaints to the Consumer Protection Division of the Georgia Attorney General’s Office.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes.

1. As explained in more detail in our testimony, a three-part rate is a rate that separately prices the three primary cost components that comprise a customer’s bill; specifically, the customer, demand, and energy charges, and in so doing, better reflects and aligns cost recovery from customers using BTM resources. [↑](#footnote-ref-2)
2. The RNR monthly netting pilot is not available to customers receiving service under the Company’s FlatBill, Pre-Pay, Community Solar, or Real Time Pricing tariffs. [↑](#footnote-ref-3)
3. The Company’s current Solar Avoided Energy Cost rate is $0.026763/kWh. This compensation to BTM customers is designed to comply with the Cogen Act’s mandates that customers be credited “at an agreed to rate as filed with the commission” that is not “above avoided energy cost.” O.C.G.A. §§ 46-3-55(1)(C)(ii), -56(a). [↑](#footnote-ref-4)