

Yoder/Thurber

## **RESOLUTION NO. 6457**

**WHEREAS,** in 2009, Rider Schedule No. 483 – Net Metering Service was developed in response to Legislative Bill 436, which required utilities to accommodate net metering of electricity use for certain customer-owned generation; and

**WHEREAS**, customers taking service on Rider Schedule No. 483 are billed for their net electric usage at the monthly rate in the customer's applicable rate schedule, and the customer receives a credit for net excess generation; and

**WHEREAS,** Rider Schedule No. 483 currently has a size limitation of 25kW aggregate system AC (alternating current) nameplate; and

**WHEREAS,** in order to enhance customer choice and facilitate greater customer participation in distributed generation solutions, the District proposes to increase the aggregate system size limit for Net Metering services under Rider Schedule No. 483 from 25kW to 100kW; and

**WHEREAS,** the District's Rate Consultant, The Brattle Group, has issued an opinion letter stating their recommendation for the rider changes.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Directors of Omaha Public Power District approves the revisions to Rider Schedule No. 483 – Net Metering, as set forth on the attached Exhibit A, to be effective September 1, 2021.

Return to Rates and Riders List

### RIDER SCHEDULE NO. 483

### Net Metering Service

### APPLICABILITY

This Rider Schedule is applicable to all Customers in OPPD's Service Area with a Qualified Generator not taking service for the same Qualified Generator under Rider Schedule No. 355. This Rider Schedule is also not available to Customers taking service under Rate Schedule No. 357 – Municipal Service. Energy Storage systems capable of storing OPPD-supplied energy and exports that energy back to OPPD's system do not qualify.

DG Systems qualifying for Rider Schedule No. 483 shall not exceed 25kW 100kW in the aggregate system AC nameplate capacity, as determined by OPPD during the DG application and approval process.

### **BILLING COMPONENTS**

Net Excess Generation Credit:

Excess Generation Summer (June 1 - Sept. 30) Non-Summer (Oct. 1 - May 31)

Per kWh 4.00 cents/kWh 3.52 cents/kWh

### **Determination of Customer Bill**

The Customer can use Qualified Generator electrical output to supply all or a portion of the Customer's Demand and deliver the surplus to OPPD. At the end of the billing period, the net flow of the energy between the Customer and OPPD will be calculated, and the Customer's bill will be based on the net energy flow as follows:

- Net flow from OPPD to the Customer: The Customer will be billed for the net use at the
  monthly rate and based on the provisions included in the Customer's applicable Rate
  Schedule.
- Net flow from the Customer to OPPD: The Customer will be billed for the non-energy charges based on the provisions included in the Customer's applicable Rate Schedule and will receive a bill credit for the Net Excess Generation. If the bill credit is greater than the current month's billing, the Customer will carry an account credit balance for use in future months. At the end of the calendar year, any excess bill credits associated with Net Excess Generation will be paid to the Customer.

### **ADMINISTRATIVE**

### **Definitions**

*Net Excess Generation*: Production of more electrical energy than is consumed by the Customer during a billing period.

### **Special Conditions**

Customers are responsible for Qualified Generator equipment and services required for interconnection. If desired, Customers are responsible for metering to measure the energy produced by the Customer's Qualified Generator. The Customer will maintain ownership of renewable energy credits associated with a Qualified Generator.

Customers taking service on this Rider Schedule are not eligible for OPPD's Level Payment Plan.

OPPD will provide, at no additional cost to the Customer, metering that is capable of measuring the flow of electricity in both directions. This equipment may be a single bidirectional Meter, smart Meter, two Meters, or another Meter configuration that provides the necessary information for service under this Rider Schedule.

## Service Regulations

Customers under this Rider Schedule must comply with all OPPD Service Regulations.

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Board of Directors Omaha Public Power District 444 South 16th Street Mall Omaha, Nebraska 68102-2247

Ladies and Gentlemen:

# I. Background

The Omaha Public Power District (OPPD) seeks to modify Rider Schedule No. 483 – Net Metering by increasing the size limitation from 25kW aggregate system AC limit to 100kW aggregate system AC limit.

*Rider Schedule No. 483 – Net Metering.* The Legislature developed this Rider in 2009 through Bill 436, requiring utilities to allow net metering for customer-owned generation.

The Rider Schedule applies to all OPPD's Service Area customers with a Qualified Generator not taking service for the same Qualified Generator under Rider Schedule No. 355. The Rider Schedule is unavailable to customers taking service under Rate Schedule No.357 – Municipal Service. Energy Storage systems capable of storing OPPD-supplied energy and exports that energy back to OPPD's system do not qualify. Currently, DG Systems qualifying for Rider Schedule No. 483 shall not exceed 25kW in the aggregate system AC nameplate capacity, as determined by OPPD during the DG application and approval process.

Under the Rider, net metering applies whenever there is net flow from OPPD to the customer. Customers will be billed for the net use at the monthly rate and based on the provisions included in the customer's applicable Rate Schedule.

Whenever net flow is from the customer to OPPD, net excess generation credit is paid to the customer as follows:

Excess Generation Summer (June 1 – Sept. 30) Non-Summer (Oct. 1 – May 31)
Per kWh 4.00 cents/kWh 3.52 cents/kWh



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# II. Discussion

It is reasonable and in conformance with general industry practice to modify riders in a way that provides increased consumer options and customer value while at the same time not negatively impacting other customer classes or affecting the equitable allocation of costs between and among customer classes. Increasing the aggregate AC limit to 100kW provides increased customer value and provides customers with more options to meet their energy demands. The larger system sizes will also positively impact clean energy supply and reduce OPPD's supply of fossil-fuel-based generation.

We understand that OPPD's analysis shows that intra-class equity issues are not likely to be a significant issue as the number of residential and small-commercial customers potentially taking advantage of the 100kW system is small. We also understand that OPPD intends to have this change in Rider No. 483 be temporary and anticipate thoroughly reviewing all aspects of Rider No. 483 upon implementing AMI, scheduled to be completed in 5-6 years.

The issue of net energy metering (NEM) is an important one. Many utilities are looking to reform NEM to more accurately reflect the costs the utility avoids when it purchases energy from DG systems and minimizes intra-class equity issues. While OPPD's NEM compensation is more economically sound than a more traditional NEM that does not have a different net excess compensation rate, there can still be intra-class equity issues from OPPD's existing NEM. For this reason, we recommend that OPPD closely monitor the uptake on Rider No. 483 after the change in aggregate system capacity and act accordingly if initial expectations on customer uptake are wrong.

# III. Findings

We have reviewed the District's proposed change to Rider No. 483. It is our opinion that with the recommended monitoring plan, the District's rates continue to conform to standard utility criteria as fair, reasonable, and non-discriminatory.

# IV.Recommendation

We recommend that the board adopt the proposed change to Rider No. 483.

Respectfully yours,

Philip Q Hanser
The Brattle Group
Principal Emeritus
THE Brattle GROUP

Agustin J. Ros The Brattle Group Principal



# **Board Action**

#### **BOARD OF DIRECTORS**

August 17, 2021

## ITEM

Proposed Change to Rider Schedule No. 483: Net Metering Service

### **PURPOSE**

Board Approval to update the applicability for Rider Schedule No. 483 – Net Metering Service

### **FACTS**

- In 2009, Rider Schedule No. 483 was developed in response to Legislative Bill 436, which a. required utilities to accommodate net metering of electricity use for certain customerowned generation. Customers taking service on Rider Schedule No. 483 are billed for their net electric usage at the monthly rate in the customer's applicable rate schedule, and the customer receives a credit for net excess generation.
- Rider Schedule No. 483 currently has a size limitation of 25kW aggregate system AC b. (alternating current) nameplate.
- In order to enhance customer choice and facilitate greater customer participation in C. distributed generation solutions, the District proposes to increase the aggregate system size limit for Net Metering services under Rider Schedule No. 483 from 25kW to 100kW.
- d. The District's Rate Consultant, The Brattle Group, has issued an opinion letter stating their recommendation for the rider changes.

#### ACTION

The District recommends Board approval of the revisions to Rider Schedule No. 483 - Net Metering Service, as set forth on the attached Exhibit A, to be effective as of September 1, 2021.

RECOMMENDED:

APPROVED FOR BOARD CONSIDERATION:

DocuSigned by: John W. Hurber

Interim CFO – John W. Thurber

Director Treasury & Financial Operations

L. Javier Fernandez

1. Janier Fernandes

DocuSigned by:

President and CEO

JT:bru

Exhibit A – Schedule 483 Proposed Revisions Attachment:

Exhibit B – Letter from The Brattle Group

Resolution