

Consumer Protection for Low-to-Moderate (LMI) Communities

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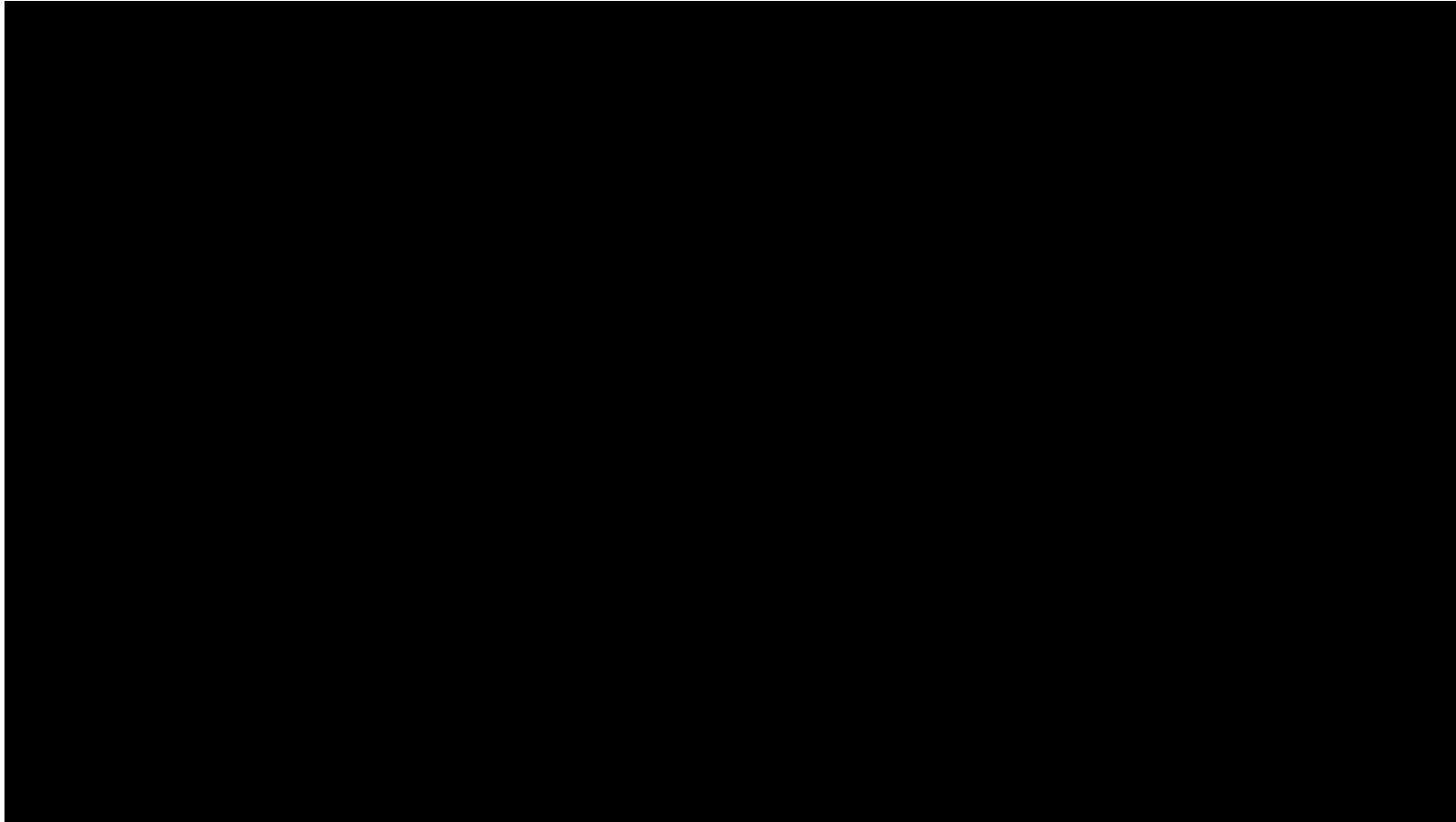
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CESA 2024 Members Meeting, June 3-4, 2024

Consumer Protection for LMI Communities

Who is OPC?



Consumer Protection-Evolution in the DC



Consumer Protection

DC-PSC- Regulatory (Deregulation)

CBOR

Incumbent LDC

Customer Choice TPP

Office of the Attorney General for the District of Columbia

Regulated and unregulated Energy providers

non-renewable &/or fuel mix requirements

RPS (Penalty), SETF, EATF- Funding- Rooftop (individual) Solar, SFA, CREF, EE, etc.

Non-Renewable

Renewable

Billing, Usage, Metering, disconnection, payment

Billing, Usage, Metering, interconnection, agreement, credits,

Billing, Usage, Marketing, pricing, payment

Explore ways to modify market choice rules- e.g., restricted access to low-income, allow strict regulatory oversight including penalty

Need for Revised CBOR pre-conditions for solar, interconnection, credits,

Consumer Protection for LMI Communities

CBOR



- **The Consumer Bill of Rights (CBOR) created in 1979 was not modified until 2009 (about a decade after deregulation) through the creation of a working group composed of representatives from the Office of the People's Counsel, DC PSC, Advisory Neighborhood Commissions, civic associations, the utility companies, and competitive suppliers/providers.**
- **Deregulation- brought customer choice- i.e., service from regulated (incumbent) and unregulated (third-party suppliers or TPP)**
- **Selected aspects of the CBOR have been revised in 2018, 2019, and 2020. It still requires more changes to protect consumers in an energy market that has become increasingly complex and offers energy derived from multiple sources;**
- **Why revisions to CBOR are necessary? About 50% of DC's households are LMI. In the emerging new energy landscape, the protection of half of the city's residents necessitates that the CBOR has to be a living document requiring continuous improvements or revisions.**

Consumer Protection for LMI Communities- Renewables and Non-Renewable Generation

- DC's aggressive RPS standard requires that 15% of the retail load should come from Solar generated within DC by 2041 and 100% renewable by 2032.
 - ✓ Existing Consumer Protection issues and complaints related to homeowners with rooftop solar and CREF include (OPC reported about 30 solar-related complaints per year):
 - ✓ Rooftop Solar owned by homeowners
 - Interconnection issues
 - SREC/Credits
 - Agreements
 - Net Metering (billing)
 - ✓ Micro-grid
 - Interconnection
- Consumer Protection involving TPP
 - ✓ Non-renewable and Renewable [DC PSC has only the authority to issue a permit]
 - Marketing practices
 - Terms and conditions
 - Pricings and contracts
 - ❖ Because of the difficulty of offering consumer protection to customers of TPP, it has become more important to find ways to revise existing market rules.

Consumer Protection for LMI Communities Issues



- **OPC has helped consumers with solar-related complaints, including:**
 - ✓ **Interconnection issues;**
 - ✓ **Credits for excess generation;**
 - ✓ **Credit for subscription to community solar;**
 - ✓ **Producing an educational guidebook on solar;**
 - ✓ **Investigate misleading marketing information;**
 - ✓ **Education on pre-conditions for rooftop solar;**

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Looking Ahead



- **Challenges and potential solutions to emerging consumer protection issues not currently in CBOR, among others,:**
 - ✓ **Research the plausibility of limiting the delivery of energy services to LMI (esp. Low-income) by TPP;**
 - ✓ **Research strategies to modify existing market rules as a means to amend the CBOR related to renewable generation;**
 - ✓ **Research and propose ways of expediting DER interconnections and study ways of minimizing the cost of interconnection;**
 - ✓ **Educate consumers on the plausibility of combining solar with storage;**
 - ✓ **Study the reasonableness of creating separate rate classes for DER customers, including compensation mechanisms;**
 - ✓ **Study the feasibility of making use of affordability data, including a study that OPC has completed, as a tool to design rates that are more consumer-protective for LMI ratepayers (i.e., PIP-based rates).**

Consumer Protection for LMI Communities

DC Solar for All Program



- **Brief Explanation**
- **Collaboration**
- **Program experiences**
- **Issues and recommendations**

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