

FILED
APR 05 2021
MISS. PUBLIC SERVICE
COMMISSION

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF MISSISSIPPI**

Pursuant to the Order Establishing Docket
to Review the Efficacy and Fairness of the
Net Metering and Interconnection Rules

Docket 2021-AD-19
(Filed February 2, 2021)

**OPENING COMMENTS OF DIMENSION RENEWABLE ENERGY TO
ORDER ESTABLISHING DOCKET 2021-AD-19**

Brandon Smithwood
Director of Policy
Dimension Renewable Energy, LLC
3280 Peachtree Rd NE 7th Floor,
Atlanta, GA 30305
Phone: 978-869-6845
Fax: 877-277-8506
bsmithwood@dimension-energy.com

April 5, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF MISSISSIPPI**

Pursuant to the Order Establishing Docket
to Review the Efficacy and Fairness of the
Net Metering and Interconnection Rules

Docket 2021-AD-19
(Filed February 2, 2021)

**OPENING COMMENTS OF DIMENSION RENEWABLE ENERGY TO
ORDER ESTABLISHING DOCKET 2021-AD-19**

I. Introduction

In accordance with Rule 14 of the Mississippi Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), Dimension Renewable Energy [Dimension] submits comments to the Order Seeking Comment 21-AD-19 (“Order”).

Dimension Renewable Energy is a national solar energy and energy storage project developer. Founded in 2018, Dimension is headquartered in Atlanta, with regional offices in New York City and San Francisco. The Dimension team builds on over 1,000 megawatts of solar and battery storage development experience and is currently developing more than 360 megawatts of community solar projects nationwide, including a number which are operating under net energy metering programs.

Dimension is primarily interested in potential modifications to the Mississippi Renewable Energy Net Metering Rule (MRENMR) and Mississippi Distributed Generator Interconnection Rule (MDGIR) that may facilitate the development of a viable net-metering based community solar program in the state. Through its participation in this proceeding, Dimension can provide

suggestions for the sustainable development of net-metering programs that will spur investment in the local solar industry and provide benefits and protections for customers. We believe the general initial scope put forward in the Order Seeking Comment encompasses the issues that need to be addressed.

II. Background & Interest in the Order

Dimension has developed solar projects in every region of the United States and our staff has been intimately involved in net metering and net-metering-alternatives policymaking at the legislative and regulatory level in several states. This experience includes extensive work on the Value of Distributed Energy Resources (VDER) tariff in New York, the Net Energy Billing program in Maine, and various NEM Successor tariffs in California. Commercially, Dimension has developed, financed, and sold dozens of operational solar and solar-plus-storage projects under these regulatory structures.

Dimension is responding to the Order as an intervenor within the docket with the primary purpose of modifying the Mississippi Renewable Energy Net Metering Rule (MRENMR) and Mississippi Distributed Generator Interconnection Rule (MDGIR) and generally supports the broad scope outlined in the Order.

III. Dimension's Comments on the Order

1. Have the Net Metering and Interconnection Rules been effective in creating meaningful access to renewable self-supply opportunities for Mississippi electric customers?

No. The current Net Metering (NEM) rules have not been effective in creating access to renewable self-supply opportunities. As of March 2020, less than 3.5 megawatts of self-supplied renewables had been installed under the current regulatory structure.¹ It is our belief that

¹ 2020 Entergy NEM Report, 2019 Net Metering data from EIA Form 861, and May 2019 update from Brent Bailey

reforming the Net Metering and Interconnection Rules will have the effect of increasing access to renewable opportunities for Mississippi electric customers and spurring economic development in the state's renewable sector.

2. What, if any, modifications to the Net Metering and Interconnection Rules could meaningfully increase customer access to renewable self-supply?

A number of states have taken actions either legislatively or administratively to create community solar programs through their net metering rules. Maryland² and Maine³ created community solar programs based on net metering legislatively. New York⁴ and Massachusetts⁵ created community solar programs by modifying net metering through Commission proceedings such as the instant proceeding before the Mississippi Commission. Dimension Renewable Energy (Dimension) suggests that Mississippi build on the experiences of these states that the following modifications to the Rules would meaningfully increase customer access to Net Metering self-supply:

- Allow multiple customers to receive net metering compensation from a single distributed generator facility (DGF) through a subscription to a proportionate amount of the facility's output. By allowing more than one participant to receive energy credits from a net metered DGF customers will have increased ability to access and choose their renewable self-supply option. Additionally, this will increase the ability of customers who are renters, live in multi-

² Maryland Acts of 2015 (HB 1087): <https://mgaleg.maryland.gov/2015RS/bills/hb/hb1087e.pdf>

³ Maine State Statutes Chapter 478, Acts of 2019 (LD 1711):
<https://www.mainelegislature.org/legis/bills/getPDF.asp?paper=SP0565&item=4&snum=129>

⁴ New York Public Service Commission, "Order Establishing a Community Distributed Generation Program and Making Other Findings" (CASE 15-E-0082)
<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={76520435-25ED-4B84-8477-6433CE88DA86}>

⁵ Massachusetts net metering laws and regulations did not explicitly call for community solar, but allowed for generators to allocate credits to other accounts within the utility service territory which was the foundation under which over 200MW of community solar was developed.

family properties, or who are financially or physically unable to install a DGF behind their meter to access the benefits of NEM.

- Remove the requirement that DGFs be located at the electric customer's premises. Aside from the financial hurdle of installing a DGF, many customers are not physically able to install renewable energy equipment at their residence or business. By allowing a customer to be a party to a DGF located outside of their premises gives entire classes of customers access to renewable self-supply options. Customers should be able to "remotely" net meter and receive bill credits from a project of their choice. Indeed, in states like Maine, Massachusetts, and Maryland where net metering has been used as the foundation of community solar, the generator account is a customer and additional customers can receive any or all credits for exported generation.
- Increase the maximum allowable sized project for residential and non-residential customers under the Chapter 3 of the Rules to 5 MWac. As it stands the 2 MWdc capacity cap for non-residential customers is not ideal in two respects: (1) The size prevents projects from achieving economies of scale and thus they are more expensive and less likely to provide customers with rational financial incentive to build; (2) Placing the cap on the direct current capacity of the renewable power source is counterintuitive since these inverter-based resources export power onto the electric utility (EU) system in alternating current. From a grid planning perspective, it is more reasonable to cap a project's capacity based on its maximum output to the grid as measured in alternating current rather than the system's nameplate size in direct current.

- Compensate DGF's for their net exports to the grid at the retail rate based on their customer class. Presently the compensation for net exports at the avoided cost of wholesale power does not provide sufficient incentive for customers to choose to self-supply, nor does it properly compensate DG for its value. A 2014 study provided to this Commission by Synapse Energy Economics found net benefits for Mississippi customers at a net metering rate of 17 cents per kWh. Synapse concluded that "net metering participants in Mississippi would need to receive a rate beyond the average retail (variable) rate in order to pursue net metering".⁶ Thankfully the cost of solar has fallen dramatically since 2011, but the value to the electric system, and thereby ratepayers, remains. Allowing exports to offset against customer credits at the retail rate would allow DGF owners to recoup the cost of their investment and benefit from further savings on their electric bill.

Research by the National Renewable Energy Laboratory (NREL) found that across multiple states low-cost policies such as net metering and interconnection reform have improved market penetration for DG technologies and supported the growth of clean energy industries. When enacted in nascent DG markets these policies are found to have produce rapid growth in DG and have increased the effectiveness of later market creation policies like an RPS or financial incentives.⁷ We urge the Commission to consider the rule modifications above in order to provide greater access to renewable energy.

⁶ Synapse Energy Economics, Inc., "Net Metering in Mississippi: Costs, Benefits, and Policy Considerations," September 19, 2014, pp. 43-44, available at: <https://www.synapse-energy.com/sites/default/files/Net%20Metering%20in%20Mississippi.pdf>.

⁷ See: Synapse Energy Economics, Inc., "Show Me the Numbers A Framework for Balanced Distributed Solar Policies," November 10, 2016, available at: https://www.synapse-energy.com/sites/default/files/Show-Me-the-Numbers-16-058_0.pdf; and Krasko, V., Doris, E. 2012. Strategic Sequencing for State Distributed PV Policies: A Quantitative Analysis of Policy Impacts and InteractionsPDF. Golden, CO: National Renewable Energy Laboratory. NREL/TP-7A30-56428

3. What, if any, modifications to the Net Metering and Interconnection Rules would incentivize increased participation by both net metering customers and industry providers such as developers, designers, installers, and maintenance providers for distributed generation facilities?

As a developer of over 1,000 MW of distributed solar generation, the team behind Dimension believes our responses to Question 2 address modifications to the Rules that would incentivize and stimulate economic activity for all industry participants.

Dimension's work in other states has shown that solar-friendly net metering policies have the potential to benefit wide-ranging sectors of the economy:

- Local electricians, construction workers, surveyors, and engineers are hired to design and build projects. A study by the Brookings Institution found that workers in clean energy earn wages 8 to 19 percent higher when compared to all workers nationally. Many occupations in the sector also tend to have lower educational requirements (approximately 50 percent earning no higher than a high school diploma).⁸
- Farmers and rooftop owners receive steady, fixed-income leases on their land throughout the lives of a solar project (25-40 years). The suggested project size cap of 5 MWac uses roughly 30 acres of land, allowing farmers to continue agricultural and livestock production on their remaining fields. These lease revenues, which are typically higher than agricultural commodity prices, can provide farmers the stability to keep farms in family ownership and prevent conversion to other land uses.

⁸ Muro, M., Tomer A., Shivaram R., and Kane J. 2019. Advancing Inclusion Through Clean Energy Jobs. Washington, DC: Brookings.

- Maintenance providers can contract for long-term operations and care work of distributed solar facilities. This extends to shepherds and beekeepers who can use a solar project's groundcover as feedstock for their animals.
- 4. What, if any, modifications to the Net Metering and Interconnection Rules should the Commission consider to increase low-income access to, and participation in, net metering?**

Mississippi's low-income population spends a disproportionate amount of their income for energy.⁹ In addition to the modifications listed in response to Question 2 the Commission should remove the cap on the number of low-income participants that can receive the low-income adder to the Total Benefits of Distributed Generation and the fifteen-year duration limit attached to it. The cap is currently set at the first 1,000 qualifying applicants on a first-come, first-served basis. Given the large number of customers who are low-income and are renters the cap prohibits access to those who could benefit most. Additionally, the fifteen-year limit on a customer's ability to receive the adder is arbitrary and does not consider the customer's ongoing financial situation. We suggest this limit be removed and the adder made available to qualifying customers for the duration of the DGF's operational life. We also suggest that the Commission adopt an added incentive level based on other states which have considered the additional costs and need for enhanced savings for serving low-income customers. These incentives can come either as additional c/kwh credit value applied to participating customer bills or via an upfront payment to the project owner. We present a summary of relevant incentive structures below.

⁹ A study by the American Council for an Energy-Efficient Economy found that 38% of households in Mississippi's region pay more than 6% of their income on energy bills. Dreihobl, A., Ross, L., and Ayala, R. 2020. How High are Household Energy Burdens? Washington, DC: American Council for an Energy-Efficient Economy.

Rhode Island: In 2020 Rhode Island PUC Docket 5088 explored the incentives necessary for development of low-income DG and low-income community solar. In its filing Sustainable Energy Advantage (SEA) highlighted the incremental upfront cost of initial customer acquisition and incremental ongoing cost of billing and customer care for LMI participants. SEA found that installed costs for projects serving LMI customers required a \$0.37/W to \$0.62/W premium over non-LMI ground-mounted solar projects.¹⁰ In changes to the Renewable Energy Growth Program Tariff National Grid proposed an incentive adder of \$0.03/kWh for projects that subscribed a minimum of 20% of output to customers on their Low Income Rate tariff.¹¹

New Hampshire: In July 2019 New Hampshire put into law a \$0.03/kWh adder for LMI community solar projects effective for two years. After July 2021, the incentive steps down to \$0.025/kWh. After a year, the PUC will commission a report on the development of the market for LMI community solar projects and provide a recommendation on whether the addition shall be increased or decreased.¹² Dimension has found in our modeling that the project size cap of 1³ MWac is prohibitive of successful development at these rates, but at larger project sizes such an incentive will support low income participation.

Massachusetts: – As part of MA's SMART Program \$/kWh adders are provided to projects based on their location or target off-taker. The Low Income Community Shared Solar Tariff is available for projects with at least 50% of its energy output allocated to LMI customers and provides a \$0.01/kWh adder above the base Shared Solar Tariff rate. The adders have spurred

¹⁰ Kennerly, J. August 28, 2020. 2021 REG Public Policy Adder Development Process. Sustainable Energy Advantage, LLC. Available at: [2021 REG Public Policy Adder Second Stakeholder Meeting](#)

¹¹ National Grid. November 13, 2020. Available at: [2021 Renewable Energy Growth Program Tariff and Rule Changes](#)

¹² New Hampshire Senate Bill 65. Available at: <https://legiscan.com/NH/bill/SB165/2019>

thus far the development of over 740 MW under the Shared Solar Tariff, but only 76.2 MW under the Low Income Shared Solar Tariff.¹³ Due to the additional cost in acquiring and managing LMI customer offtake Dimension does not believe the incentive adder provides an accretive economic incentive to develop projects under this tariff.

New York: Slow adoption of New York's LMI community solar program due to perceived barriers to entry, associations with other negative experiences, and variability in bill credit has prompted NY-Sun to propose an "Inclusive Community Adder" for projects with subscribers classified as LMI. The adder aims to provide \$0.2/W for 50 MWdc of qualifying projects and later will be stepped down to eventually provide for the development of 500 MWdc of LMI community solar. Dimension believes that a \$0.2/W upfront incentive may provide enough incentive to participate in this program, though without regulatory certainty for a sizeable market as envisioned in New York, Mississippi is a riskier project development environment than New York and may require higher incentives.

Mississippi: In 2015 PosiGen proposed a \$1.0/W incentive paid by IOUs to installers (\$1.5/W in LMI areas) if they performed energy audits and provided a scope of work for energy efficiency upgrades. The incentive was tied to an overall minimum total home energy consumption reduction. The proposal was modeled after the Single-Family Affordable Solar Housing (SASH) program and the Multi-Family Affordable Solar Housing (MASH) programs in California.¹⁴ Such an incentive is likely necessary for rooftop projects and to support the additional services

¹³ SMART Adder Tranche Status Summary. Available at: <https://masmartsolareversource.powerclerk.com/MvcAccount/Login>

¹⁴ PosiGen. July 1, 2015. "Comments of PosiGen Inc." Available at: https://www.psc.state.ms.us/InSiteConnect/InSiteView.aspx?model=INSITE_CONNECT&queue=CTS_ARCHIVEQ&docid=357313

beyond solar that are involved in SASH and MASH; a community solar offering can likely operate with less.

Dimension urges the Commission to take a progressive approach towards the implementation of a Low Income adder. Dimension proposes to the Commission the below \$/W upfront incentives or ongoing \$/kWh adders to the volumetric retail rate for low-income customers. The Commission could consider revisiting the effectiveness of the incentive after four years and recommending at that time its increase or decrease. Given that project development cycles take two years and relationships with low income serving organizations take time to develop, Dimension believes time is needed to determine the efficacy of incentives.

Project Size	Upfront Incentive	OR	Ongoing Low-Income Adder
<500 kWdc	\$1.0/W		\$0.06/kWh
500 – 1000 kWdc	\$0.75/W		
1000 – 1500 kWdc	\$0.5/W		\$0.04/kWh
>1500 kWdc	\$0.25/W		

5. What, if any, modifications to the Net Metering and Interconnection Rules should the Commission consider to better enable commercial and industrial enterprises to self-supply?

Dimension's responses to Question 2 provide Rule modifications that we believe will provide greater access to renewable energy for commercial and industrial (C&I) customers.

Due to the onsite requirement for DGFs a C&I customer who would normally find the NEM program attractive might not have adequate area to host a DG system. Allowing a customer to subscribe to an offsite DGF and receive credits remotely from the facility would meaningfully increase awareness and demand for such systems. As a large consumer of a particular DGF's

generation that C&I customer would act as an “anchor tenant” for the project. The anchor tenant provides a DG developer with offtake assurance that allows them to attract a greater number of C&I or residential subscribers to a single project. Offsite DGFs would also provide lease revenue to owners of third-party “host” rooftops, providing a source of income to other C&I enterprises who may also opt-in to receiving a project’s credits; this is often attractive to properties for which the owner is not the tenant occupying the building and/or the building has much more roof space to host a solar system than is needed to serve the load of that building.

6. What, if any, modifications should be made to the annual reporting requirements of the current Net Metering Rule?

The current reporting requirements under Chapter 5 of the Rules could be modified to identify the number of customer accounts that are being compensated under the Low Income Benefits Adder. This data will help the Commission and industry participants understand the progress and the gaps in the participation of LMI customers.

7. Should the Commission modify or remove the existing cap(s) on total installed net metering capacity?

Yes, the Commission should remove the existing cap on total installed net metering capacity. An artificial cap on net-metered DG penetration creates economic uncertainty for DG systems and the customers and solar installers who invest in them. This has the effect of stifling new market entrants and established companies from acquiring new customers. Alternatively, if the Commission would prefer to maintain a cap, it should consider transitional rules to a successor regime when that threshold is reached to avoid a steep drop off in customer participation and installation activity at the cap level.

8. Should the Commission modify the timing or manner in which net metering customers are credited or compensated for excess energy exported to the grid?

No, the current monthly billing period to measure usage and any excess energy exported by a DGF to the EU is sufficient.

9. What measures or mechanisms could most equitably reduce the upfront cost burdens faced by customers interested in self-supply through net metering?

Access to solar is out of reach to Mississippians who the rent their homes, cannot afford to re-roof an older home, or cannot afford the upfront cost of a solar installation. Without an upfront incentive or retail rate credit net-metering the ability of customers to payback their investment and save money is in question.

Dimension believes that reducing upfront cost burdens can be pursued through Commission action to move to retail rate net metering, increasing the value of and eligibility for Low Income Benefit Adders and maintaining customers' ability to lease DG facilities. Refer to responses to Questions 2-4 for additional information on these proposals.

10. What role, if any, should the Mississippi Public Utilities Staff serve in reviewing facilities studies for Level 2 and/or 3 interconnections?

Dimension does not believe there is a need for Staff to directly review facilities studies. This should remain the role of the EUs as is the case in every jurisdiction in which Dimension has worked. At the same time, the Commission should have a process for adjudicating complaints and disagreements that may arise between the EU and an interconnection customer.

11. In light of the Commission's recent approval of advanced metering infrastructure (AMI) for Entergy and Mississippi Power Company, are bi-directional meters still needed for effective net metering?

No response.

12. To the extent a commenter proposes a new or different compensation scheme, please explain how that proposal would directly affect a Mississippi customer's ability to self-supply. Answers to this question should include any relevant studies, surveys, financial modeling or other specific data-driven evidence supporting the position.

Dimension believes all classes of customers can benefit from amendments to the Net Metering Rule that would allow for remote net crediting at retail rates from DGFs not located behind a customer's meter. The compensation scheme would work similarly to the current crediting system except that it would allow for multiple customers to belong to a single DGF wherein credits would be apportioned among them based on historical usage.

Studies conducted in Mississippi and other states have shown that the value provided by net-metered solar exceeds a utility's avoided cost and the current Total Benefits of Distributed Generation. In 2014, a Synapse Energy Economics' cost-benefit analysis found positive net benefits to Mississippi of 17 cents per kWh. Above retail rate compensation for net metering customers was vital in encouraging customer participation and provided net benefits to customers.¹⁵ The Commission appeared to recognize this finding in its initial draft rule that created a 1:1 offset of customer generated energy at the utility's retail volumetric rate. However, when issuing the Order Adopting Net Metering Rule the Commission dismissed this Synapse finding due to cost-shifting concerns later in the report that suggested fewer utility total energy sales would imply, "fixed costs are spread across fewer kilowatt-hours [thus] The effect is a higher price charged for each kilowatt-hour sold."¹⁶ Dimension argues that this cost-shifting

¹⁵ Synapse Energy Economics, Inc., "Net Metering in Mississippi: Costs, Benefits, and Policy Considerations," September 19, 2014, pp. 43-44, available at: <https://www.synapse-energy.com/sites/default/files/Net%20Metering%20in%20Mississippi.pdf>.

¹⁶ Ibid, 12. Synapse does suggest universal access for ratepayers to community solar presents a solution to non-participant cost shifting.

argument has not been borne out in Mississippi at the current level of net-metering penetration. In a forward-looking analysis at cost shifting due to increased net-metering Lawrence Berkeley National Lab found no cost-shifting impact to rates for non-solar customers at 10% customer-sited solar penetration.¹⁷ In Mississippi, where rates are low compared to high penetration solar markets even amounts greater than 10% are likely a low penetration from a ratepayer cost perspective.

The Commission described in its 2015 net metering order a scenario in which states with high penetrations of solar due to highly compensated net-metered resources faced difficulties in “reversing course of amending their rules to rectify the unanticipated problems”. To support the notion that “reversing course” might be difficult the Commission cited a 2015 Hawaii PUC Docket in which the 1:1 retail credit offset used to expand its NEM program was amended to a 2-channel billing approach (the approach finalized in this Commission’s Order).¹⁸ At the time when Hawaii’s PUC amended its NEM rules, Hawaii Electric Company had approved 327.9 MW of net-metering resources accounting for 17% (51,680) of all customers and 30% of system peak load.¹⁹ By contrast, 5 years post rulemaking, Mississippi has a total of 3.5 MW of net metering capacity. Dimension respectfully suggests it is time for a new approach.

Crossborder Energy found in a 2017 report in Entergy’s Arkansas service territory that the benefits of net-metering outweighed the costs and that NEM customers did not shift cost to other ratepayers. Furthermore, the cost-effectiveness of solar DG resource deployment would in the

¹⁷ Lawrence Berkley National Laboratory. “Financial Impacts of Net-Metered PV on Utilities and Ratepayers: A Scoping Study of Two Prototypical U.S. Utilities,” September 2014.

¹⁸ Page 12-13. Mississippi PSC Docket 2011-AD-2. Order Adopting Net Metering Rule, issued December 12, 2015

¹⁹ Page 164. Hawaii PUC Docket 2014-0192. Decision and Order No. 33258

long run reduce the utility's cost of service. The report found that total direct benefits that solar provides ranged from 12.1 to 17.2 cents per kWh.²⁰ These benefits were (and continue to be) significantly higher than Entergy Arkansas' residential retail rates.²¹

In addition to these findings, the Commission has previously found that distributed generation provides other net benefits associated with avoided energy generation costs, future capacity investments, transmission and distribution system upgrade costs, system line losses, and environmental compliance costs. Dimension therefore believes a just compensation for net-metered customers is 1:1 crediting at the customer's retail rate.

13. Should the Net Metering Rule incorporate uniform rules or standards Applicable to community solar projects and, if so, in what way and to what extent?

Dimension believes that the proposed scope of the proceeding is broadly inclusive of Dimension's interest in modifications to the net metering programs to facilitate the creation of a community solar program. Dimension urges consideration and adoption of the shared solar system rules proposed by the Mississippi Chapter of the Sierra Club, referred to as Attachment B in their filing. Attachment B is a proposed chapter for the Commission's net metering rule which provides for Mississippi Shared Renewable Energy Systems. Attachment B is based on national best practices and successful program provisions in other states which Dimension has operated in.

14. Should the Commission continue to condition a customer's receipt of the additional compensation allowed by the non-quantifiable benefits adder on the customer's voluntary transfer of their REC ownership?

²⁰ Crossborder Energy. "The Benefits and Costs of Net Metering Solar Distributed Generation on the System of Entergy Arkansas, Inc.". September 15, 2017.

²¹ Average Entergy Arkansas residential rates were 9.85 cents per kWh in 2019 according to the EIA

Dimension believes this practice is acceptable given there is no monetary credit customers can receive from the sale of their RECs in the state at the current time. However, Dimension's proposal to allow 1:1 retail rate net crediting would eliminate the non-quantifiable benefits adder. Should RECs though, at some point, become fungible monetary certificates of exchange for compliance with a renewable portfolio standard or other such regulatory construct the customer-generator should be able to sell them to the interconnected utility.

15. Should the Commission permit meter aggregation by a single net metering customer/owner?

Yes, we believe this is in the spirit of renewable net metering and in line with the Rule modifications mentioned above.

16. How could the Net Metering Rule most effectively and accurately incorporate new or developing distributed energy resources, such as battery storage?

Battery storage could be incorporated into the Rule with an additional adder tethered to a locational or time-based value export of energy to the EU grid. Dimension supports modifications to the Net Metering and Interconnection Rules that would encourage energy storage's adoption alongside net metered DGFs.

17. What role, if any, should the Commission's Joint Solar Safety and Net Metering Working Group continue to serve going forward?

Dimension believes this Working Group is vital to the safe and efficient development and operation of solar net metering in the state. Dimension believes an inclusive group of industry, Commission, and utility stakeholders is well suited to shaping and working through the complex and technical issues that are required for the implementation of the Net Metering Program.

18. What measures and mechanisms should the Commission consider to better enable schools, state and local government bodies, and other non-profit or tax-exempt entities to participate in net metering?

Dimension believes that meter aggregation, remote crediting, and third-party ownership of DGFs would simplify participation in net metering for governmental and non-profit entities. Dimension believes these changes to the Rules would remove the barriers of development, financing, and administrative work associated with creating and operating a distributed renewable generation facility.



LEO E. MANUEL
t: (228) 214-0427
f: (866) 771-3268
e: lmanuel@balch.com

April 5, 2021

VIA E-MAIL

Katherine Collier, Esq. (katherine.collier@psc.ms.gov)
Executive Secretary
Mississippi Public Service Commission
501 North West Street, Suite 201A
Jackson, MS 39201

**Re: Order Establishing Docket to Review the Efficacy and Fairness of the Net
Metering and Interconnection Rules
Docket No. 2021-AD-19**

Dear Katherine:

On February 2, 2021, the Mississippi Public Service Commission ("Commission") issued an order in the above-referenced docket instructing interested parties to file written comments addressing the efficacy and functionality of the Net Metering Rule. Therefore, and consistent with that Order, Mississippi Power Company provides herewith its comments.

Pursuant to the Commission's Order of March 12, 2020, this filing is only being made electronically. Delivery of physical copies shall be made only upon further order of the Commission.

Thank you for your assistance in this matter.

Sincerely,

Leo E. Manuel

LEM:hr

Attachments

1310 Twenty Fifth Avenue
Gulfport, MS 39501
balch.com

P.O. Box 130
Gulfport, MS 39502

ALABAMA | FLORIDA | GEORGIA | MISSISSIPPI | TEXAS | WASHINGTON, DC

cc: Ross Hammons, Esq. (ross.hammons@psc.ms.gov)
Sally Burchfield Doty, Esq. (sally.doty@mpus.ms.gov)
David Tad Campbell, Esq. (tad.campbell@mpus.ms.gov)
Mr. Bryan W. Estes (chipestes@gmail.com)
Robert B. Wiygul, Esq. (robert@wwglaw.com)
Stephen B. Jackson, Esq. (sjackson@cooperativeenergy.com)
Mr. Alan Wilson (awilson@cooperativeenergy.com)
Mr. Ryan Burrage (Ryan.Burrage@EntegrityPartners.com)
Hart Martin, Esq. (hart.martin@ago.ms.gov)
Beth Orlansky, Esq. (borlansky@mscenterforjustice.org)
Mr. Randy E. Carroll (rcarroll@EMEPA.com)
Kacey Guy Bailey, Esq. (kacey@gloveryoung.com)
Larry D. Moffett, Esq. (larry@larrymoffett.com)
Paul Purnell, Esq. (purnell@ecm.coop)
Hunter Walters, Esq. (walters@ecm.coop)
Mr. Stephen Wright (swright@gsreia.org)
Mr. William G. Giese (WGiese@seia.org)
Robert P. Wise, Esq. (rwise@sharpewise.com)
David W. Clark, Esq. (dwclark1948@gmail.com)
Mr. Jeremy Vanderloo (jvande1@entergy.com)
Tianna H. Raby, Esq. (traby@entergy.com)
Alexander C. Martin, II, Esq. (amart12@entergy.com)
Alicia S. Hall, Esq. (ahall4@entergy.com)
Mr. Caleb Dana (mssolarenergysociety@gmail.com)
Ms. Elizabeth Galante (bgalante@posigen.com)
Jason B. Keyes, Esq. (jkeyes@keyesfox.com)
Mr. Howard Randolph (hrandolph@umcsolutions.com)
Timothy Howard, Esq. (timhoward@jacksonms.gov)
Terrell S. Williamson, Esq. (twilliamson@jacksonms.gov)
Mr. Brandon Smithwood (bsmithwood@dimension-energy.com)
Ms. Jill Mastrototaro (Jill.Mastrototaro@audubon.org)
Mr. Jeff Stone (jastone@southernco.com)
Mr. Shawn Shurden (ssshurde@southernco.com)
Rick J. Cox, Esq. (rcox@balch.com)