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TYPE: Comment

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COMMENT DESCRIPTION:

I would like to comment on the net metering provisions for residential customers. I have had a PV system for over seven years, initially installed in 2010 and expanded in 2012. We currently produce over 90% of our consumption on an annual basis. What I have found in reviewing the summer months billing data from AEPOhio that I am only being credited with the generation value during the billing period where I produce more than we consume. This shortchanges me about half the value of this summertime excess production. Of course my utility can then sell this power to my neighbors adding in an additional charge for transmission and distribution (for which I receive no credit). ORC 4928.67 describes net metering quite simply where the crediting would be the full retail value. For whatever reason OAC 4901:1-10-28 strips out the value for excess distribution and transmission. I understand there has been a court case regarding some of these issues. But I would like to lobby in support of crediting the full retail value of the excess production delivered back to the utility. Many other state rules and utility tariffs seem to work on either making it clear the excess production is credited at the full retail value, including generation, distribution and transmission. While many other states seem to carry out the accounting in kilowatt-hours. I'd advocate for performing the accounting in kilowatt-hours with a true-up annually, if needed. As a concession to the utility concerns of drastically oversized net metering systems I would support on an annual basis that the utility retains the distribution and transmission charges are retained on the excess power for those systems producing much more than annual consumption.

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Summary: Public Comment electronically filed by Docketing Staff on behalf of Docketing