



## MANITOWOC PUBLIC UTILITIES

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February 11, 2022

Steffany Powell Coker  
Secretary to the Commission Public Service Commission of Wisconsin  
PO Box 7854 Madison, WI 53707-7854  
**RE: Docket No. 3320-TE-xxx**

Dear Ms. Coker:

Manitowoc Public Utilities (MPU) is making this filing with the Public Service Commission of Wisconsin (PSCW or Commission) requesting to open a TE docket for the creation of a Voluntary Community Solar Service – Pilot Tariff (CSS Schedule). Included in this filing, MPU is providing a proposed CSS Schedule document.

An overview of the proposed CSS is provided below.

### Purpose

MPU currently offers Schedule Pgs-1 (Net Energy Billing) for customers who have installed a Parallel Generation System (limited to 20kW) on their property. The benefits of Pgs-1hitherto has been limited to property owners with available funds to make the capital investment required to construct these facilities. Even with tax incentives, the benefits of net metering elude many MPU customers due to up-front funds required, lack of property ownership, e.g. renters, poor site characteristics, e.g. poor rooftop orientation, existence of obstacles, or other similar issues. The intent of the CSS is to provide equitable access to the net metering of energy through participation in a community solar project and subsequent “virtual net metering” of energy on the customer’s bill.

While similar in concept to community solar schedules approved by Commission for other electric utilities, the MPU CSS differs in one key aspect. Rather than requiring a customer to make an up-front capital investment in the Project, the MPU CSS contains a “Monthly Project Charge” to the customer based on the customer’s kW participation of the Project. The Monthly Project Charge will be based on the \$/kWh rate MPU pays under a Purchase Power Agreement (PPA) negotiated with a third-party developer of a Community Solar project that is constructed in the MPU service territory and connected to an MPU distribution facilities(s). Moreover, the MPU CSS reduces financially and location issues, for customers to participate in a community solar program making accessible to much broader array of MPU customers including customers with limited finances.

Under the CSS, MPU intends to construct a 500 kW to 1,000 kW community solar facility (Project) in conjunction with a third-party developer who will own, operate, and maintain the

facility. MPU will enter into a PPA with the developer for the term of the Project, as referenced in the tariff language, purchasing all energy, capacity, and environmental attributes.

### Eligibility, Requirements, and Limitations

To be eligible to participate in the CSS pilot, a customer must take service under an MPU Residential Service (Rg), General Service (Gs), or Commercial/Industrial Service (Cp) Service Schedule. It is important to note that the CSS is an energy-only tariff and the virtual energy netting detailed below pertains only to the energy component of a participating customer's Service Schedule. To be clear, customers taking service under a tariff with demand components will receive no netting with respect to demand.

Customers under the CSS participate by subscribing to a capacity amount, in 1 kW blocks, up to 20 kW for the remaining life of the Project. If a CSS customer ceases to take service from MPU, the customer is terminated from the CSS and the corresponding capacity from the Project reverts to back to MPU and is made available to other potential CSS customers.

### CSS Monthly Project Charge

A customer's Monthly Project Charge will be based on the customer's proportional kW subscription in the Project multiplied by the Project Base Rate (the PPA rate converted to \$/kWh, plus any fixed project costs not included in the PPA amortized over the life of the PPA at MPU's PSCW-approved weighted average cost of capital at the time of PPA execution divided by the projected annual production of the Project) plus an administrative cost adder of \$0.003/kWh.

$$\left( \frac{\# \text{ of subscribed blocks}}{\text{Total Project Nameplate kW}} \right) * (\text{Total Project Monthly kWh}) * (\text{Project Rate})$$

where

$$\text{Project Rate} = \text{Project Base Rate} + \$0.003$$

### Monthly Credit

The intent of the CSS is to provide customers a mechanism to utilize their kW block output from the Project as if the generation was from their own rooftop solar generating facility to offset their load (Virtual Netting) as provided for by the MPU Pgs-1 schedule. To align with the Pgs-1 schedule, a customer under the CSS is also limited to 20 kW with Virtual Netting performed pursuant to section "3. Rate" of the Pgs-1. This methodology allows the customer to be Virtually Net credited on a monthly kWh basis with net monthly energy purchases from MPU charged to the customer at their applicable energy rate(s) while net monthly energy sales back to the MPU at the Energy Rate Payments (Pgs-2 Schedule) reference in the Pgs-1 Schedule.

### Examples

The following examples are provided for illustrative purposes only and do not provide all of the billing detail that would of specific rate schedule.