



New Mexico Community Solar

WNRC Meeting, Las Cruces

Christian Casillas

Director Policy Development and Research, CSCNM

Oct 4, 2023



Coalition of Sustainable Communities New Mexico

- Coalition of NM cities and counties. We work on equity-focused climate policies and projects.
- Actively working for an equitable community solar program in NM
 - Partnered on leading stakeholder process for Senate Memorial
 - Worked closely with partners and sponsors on drafting and passage of NM Community Solar Act (SB 84)
 - Intervened in NM Supreme Court case by IOUs challenging Community Solar Program
 - Active in rulemaking proceedings at NM PRC
 - Led initial outreach and delivered report of [Low Income CS best practices](#) to PRC
 - Partnering with Community Solar Program Administrator on LI outreach and education

Low-Income (LI) Carve Out

- **30% of each project** will be reserved for low-income customers and low-income service organizations
- LI household: one having a annual household income at or below **80% of the area median income (AMI)**
- Automatic LI Qualification:
 - Medicaid; Supplemental Nutrition Assistance Program (SNAP); Low-Income Home Energy Assistance Program (LIHEAP); first-time homeowner programs and housing rehabilitation programs; living in a low-income/affordable housing facility; or state and federal income tax credit programs.
- A LI subscriber can provide self attestation regarding their income and family size, but needs **confirming documentation** provided within a period of 90 days.

Program definitions of Low Income Service Organization

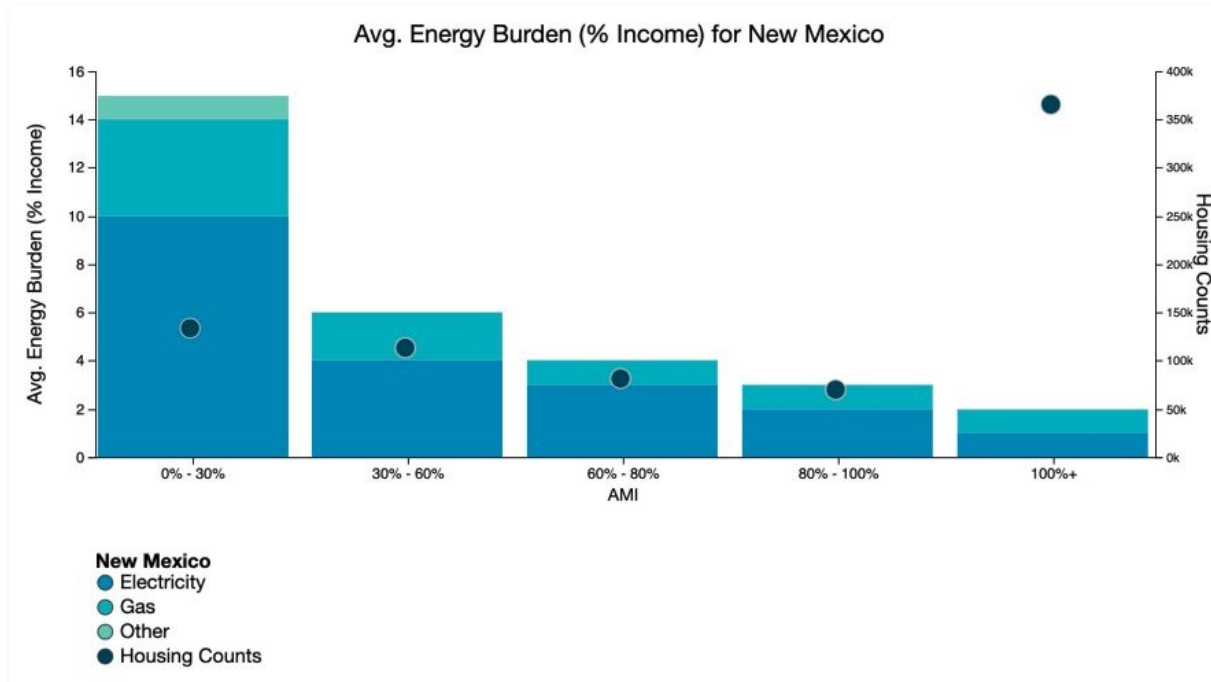
- A low-income service organization is one that provides **services, assistance or housing** to low-income customers and may include a local or central tribal government, a chapter house or a tribally designated housing entity.
- An entire multi-family affordable housing project may prequalify its entire load as a low-income subscriber, qualifying as a low-income service provider, without the consent of all tenants of record.

All 45 selected community solar projects are committed to:

- Allocate at least 50% capacity to low-income subscribers.
- Forgoing upfront costs, early termination fees, and credit checks.
- Offering a supplementary community solar bill credit, ranging from 20% to 30%, for at least five years for LI subscribers.

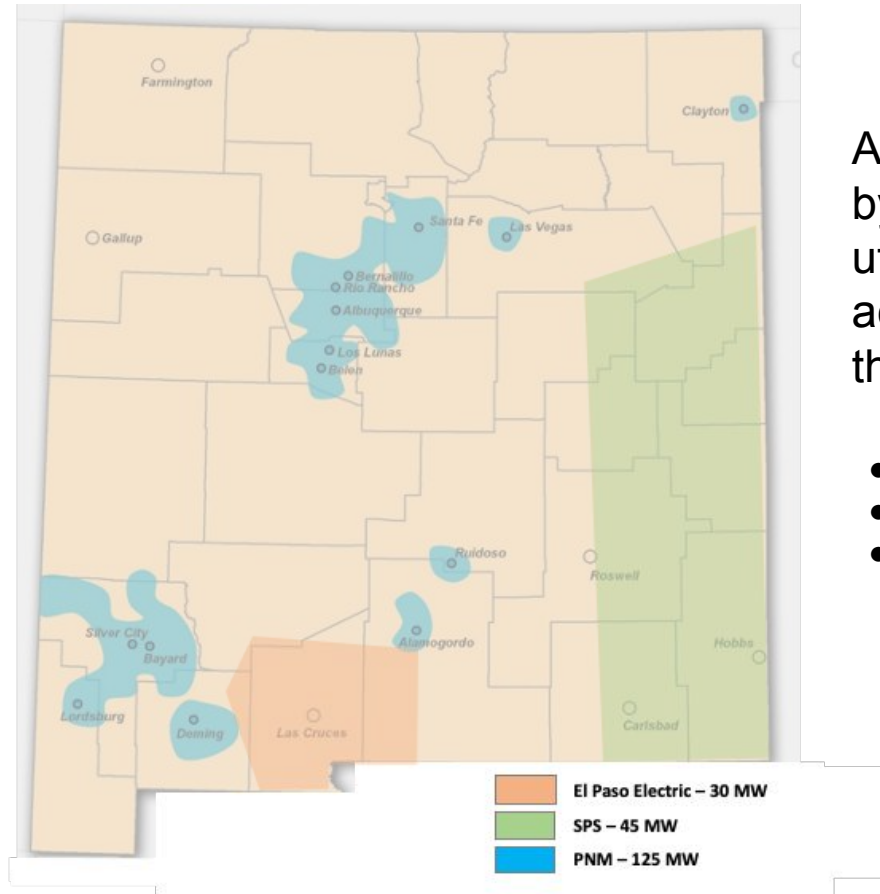
New Mexico's Context

- Approximately 328,000 households in NM that fall below 80% AMI (45% renters, 55% homeowners)
- Only 20,000 - 30,000 will be able to subscribe to this first round of community solar



Source: <https://www.energy.gov/eere/slsc/maps/lead-tool>, 2018 ACS data/US Census

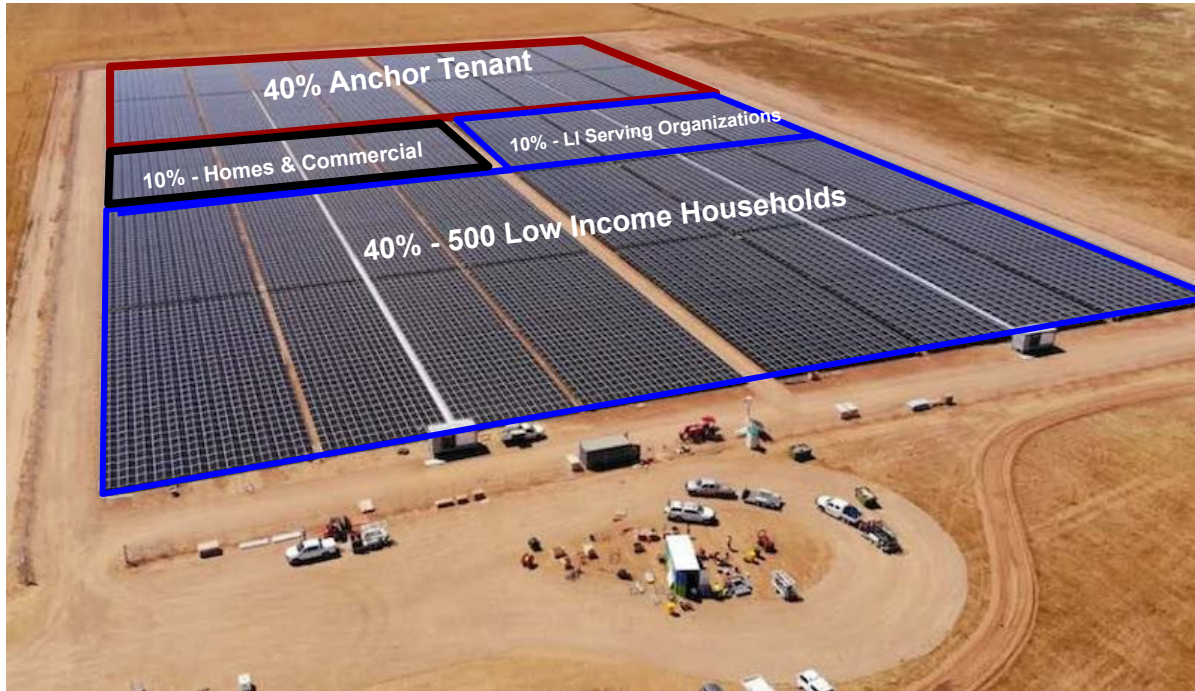
Service territories participating in Community Solar



Areas shaded are covered by the three investor owned utilities that will be able to access community solar through this program

- PNM serves 540,000 customers
- EPE serves 100,000 customers
- SPS serves 115,000 customers

Example of a 5 MW Community Solar Facility



- Up to 40% (2MW) can be a single anchor tenant, like a school or local government.
- Up to 50% (2.5 MW) could be for LI:
 - 10% (0.5 MW) filled by LI serving orgs
 - 40% (2 MW) filled by 500 LI households
- 10% (0.5 MW) filled with non-low income households and small businesses or nonprofit organizations

Summary of Foreseeable Challenges for LI enrollment:

- **Time lag after enrollment.** Enrolling households 1 year before the project will come online. This needs to be explained clearly to households.
- **Receiving 2 bills.** Many subscriber organizations may not be able to enroll households without credit cards/bank accounts. Households may be resistant to receive another bill if they don't have automatic bill pay.
- **Too good to be true.** Households unwilling to trust an unknown company asking them to sign up for a program that will save them money.
- **Documenting income.** For households not enrolled in pre-qualified programs, they will have to show “verifying documentation” proving their income, which may bring up mistrust.
- **Finding the best deal.** Households and partner CBOs will want to make sure LMI households are signing up for the best financial discounts.

Need to earn trust in this new program

- Community solar is new and will seem complicated
- Developers aren't known, takes time to develop trust

Best Practices:

- Work with community based partners and government agencies who are already connected to low-income disadvantaged communities
- Education material should be clear, multi-lingual, and multimedia

Alleviate subscriber concern about finding the “best deal”

Transparency! We plan to keep an online table of existing offers.

Comparing Community Solar Offers (Feb. 2023)

	Utility Territory	Supply Savings*	Contract Term	Cancellation Fee	Credit Check	Billing	Contact
Common Energy (see CUB's blog post here)	Ameren ComEd	10%	None, up to 20 years	None (90 days' notice required)	Soft check (no effect on score)	Auto-pay required; ComEd: Customer can choose to give Common access to utility account, or have dual billing set up. Ameren: Dual billing.	844-899-9763 hello@commonenergy.us
Arcadia (see CUB's blog post here)	Ameren ComEd	10%	15 years	None	None	Auto-pay required; Arcadia has access to your utility account and pays your utility bill through your Arcadia payment.	866-526-0083 support@arcadia.com
MC Squared (see CUB's blog post here)	Ameren ComEd	20%	2 years; then can be extended every 2 years	None	None	Auto-pay required with debit/credit card	833-970-3552 info@mc2energyservices.com
Clearway (see CUB's blog post here)	Ameren ComEd	20%	20 years	None	Soft check	Autopay available and optional	855-712-7508 customersupport@clearwayenergy.com
IGS (see CUB's blog post here)	Ameren ComEd	10%	20 years	No	No	Dual billing, autopay required	888-441-9744 communitysolar@igs.com

Example from the nonprofit Citizens Utility Board for Illinois' program:

<https://www.citizensutilityboard.org/wp-content/uploads/2021/06/SITC-Chart.pdf>

CSCNM's Education and Outreach Approach

1. [Webinars for interested organizations](#) (CBOs, NGOs, Gov, etc) that would like on-line training so that they can better support their constituencies.
2. In-person community education sessions run by partner CBOs within the 3 IOU service territories
3. LI Working Group
4. Website that has FAQs, comparison table of projects, and sign-up sheets for webinars

Questions?

Contact: Christian@coalitionscnm.org
www.coalitionscnm.org