

# Summary of Differences Between Existing and Proposed Tariff Changes

## Net Metering Rider (NM-17 vs. NM-25)

### Availability

#### Old (NM-17):

- Available on a first-come, first-served basis until the total rated generating capacity of net-metered systems in a calendar year reaches 1% of the Cooperative's peak load for the previous year.
- No further service is available for that calendar year once the 1% limit is reached.
- Members can opt for the Parallel Generation Rider but cannot switch between riders without Cooperative approval and must commit to one rider for at least one year.

#### New (NM-25):

- Available on a first-come, first-served basis with two capacity limits:
  - 1% of the previous year's peak retail demand for systems added in a calendar year.
  - 5% of the previous year's peak retail demand for the cumulative capacity of all net-metered systems.
- If the 1% annual limit is reached, no new service until January 1 of the next year; if the 5% cumulative limit is reached, no service unless total capacity falls below 5%.
- The Cooperative may limit the number or size of systems based on infrastructure capacity (e.g., circuits, feeder lines, substations).
- Members can opt for the Parallel Generation Rider or switch between riders with Cooperative approval (no one-year commitment).
- Choosing net metering waives rights under the Parallel Generation Rider and K.S.A. 66-1,184 during participation.

#### Key Differences:

- Specifies service resumption (next year for 1% limit; below 5% for cumulative limit).
- Explicitly allows infrastructure-based limits on system size/number.
- Removes the one-year commitment for rider switching, increasing flexibility.
- Adds a waiver clause, clarifying trade-offs between net metering and parallel generation.

## ***Applicability***

Old (NM-17):

- Applies to member-generators with an approved interconnection agreement under standard rate schedules.
- Maximum capacity limits:
  - Residential: 25 kW (15 kW after April 1, 2017).
  - Small/Large Commercial, Irrigation: 200 kW (100 kW after April 1, 2017).
  - Schools: 200 kW (150 kW after April 1, 2017).
- Systems must be sized based on historical load profiles, determined with Cooperative assistance.

New (NM-25):

- Applies to member-generators with an approved interconnection agreement, sized based on historical consumption per the Interconnection Agreement.
- Maximum capacity limits:
  - Residential: 15 kW.
  - Commercial, industrial, schools, religious institutions, government, agricultural: 100 kW.

Key Differences:

- Expands non-residential categories (adds religious institutions, government) but lowers school limits to 100 kW.
- Ties sizing explicitly to the Interconnection Agreement, maintaining historical consumption focus.

## **Billing and Payment**

Old (NM-17):

- Bills net consumption every ~30 days (incomplete details in provided text).
- Implies standard billing for net consumption and other charges (e.g., member, demand, minimum).

New (NM-25):

- Bills net energy consumption every ~30 days (energy delivered minus excess received).
- Positive net consumption: Billed at standard rates for energy plus member, demand, minimum, adjustments, or surcharges.

- Negative/zero net consumption: Billed for non-energy charges; excess energy retained by Victory as a contribution to fixed costs, with no credit.

Key Differences:

- Clarifies billing for positive, negative, or zero net consumption, specifying no compensation for excess energy (retained for fixed costs).
- Provides detailed charge breakdown, enhancing transparency.

**Definitions**

Old (NM-17):

- Defines “Member-generator,” “Renewable Energy Resources,” “Net metering,” and “Peak load.”
- Member-generator requirements: renewable energy, located on member’s premises, parallel operation, safety standards, automatic disconnection, single-meter connection.
- No mention of battery storage.

New (NM-25):

- Defines “Member-generator,” “Delivered Electric Energy,” “Excess (Received) Electric Energy,” “Net metering,” and “Renewable Energy Resources” (incomplete OCR text).
- Member-generator requirements similar but incomplete in provided text; likely includes single-meter connection and safety standards.

Key Differences:

- Adds “Delivered” and “Excess” electric energy definitions to clarify billing.
- Removes “Peak load” definition, using “historic peak retail demand” in Availability.
- No battery storage prohibition in the new tariff, unlike earlier versions, aligning with your clarification.

**Terms and Conditions**

Old (NM-17):

- Detailed technical/safety requirements: meters, disconnect switches, insurance, interconnection contracts, application timelines (30 days for  $\leq 10$  kW, 90 days for  $> 10$  kW), certification.
- Members retain renewable energy credits (RECs).

New (NM-25):

- References Interconnection Agreement Procedures and Rules and Regulations (no detailed technical requirements in provided text).

Key Differences:

- Streamlines by referencing external procedures, reducing tariff-specific technical details.
- Omits REC ownership mention.

## Parallel Generation Rider (PGS-R-17 vs. PGS-25)

### Availability

Old (PGS-R-17):

- Available on a first-come, first-served basis until total rated generating capacity in a calendar year reaches 4% of the previous year's peak load.
- No service once 4% limit is reached.
- Not available for resale schedules.
- Members can opt for Net Metering Rider but cannot switch without approval and a one-year commitment.

New (PGS-25):

- Available on a first-come, first-served basis until aggregate export capacity (including net metering systems) reaches:
  - 6% of historic retail peak demand (July 1, 2025).
  - 7% (July 1, 2026).
  - 8% (July 1, 2027, and thereafter).
- Excludes new/expanded facilities at  $\geq 34.5$  kV from peak demand calculations.
- No service once limits are reached unless approved.
- Not available for resale schedules.
- Members can switch to Net Metering Rider with approval (no one-year commitment).

Key Differences:

- Increases capacity limits (6%–8% vs. 4%) and includes net metering systems, with phased increases.
- Excludes high-voltage facilities from peak demand, potentially increasing capacity.
- Removes one-year commitment for switching, enhancing flexibility.

### Applicability

Old (PGS-R-17):

- Applies to member-generators with an approved interconnection agreement under standard rate schedules.
- Systems sized for anticipated load; capacity limits: 25 kW (residential), 200 kW (commercial).

New (PGS-25):

- Applies to member-generators with an approved interconnection agreement, in good standing, under standard rate schedules.
- Excludes new/expanded facilities at  $\geq 34.5$  kV unless approved.
- Systems sized to anticipated load per Interconnection Agreement; no explicit capacity limits.

Key Differences:

- Removes explicit capacity limits, relying on Interconnection Agreement.
- Adds exclusion for high-voltage facilities, aligning with Availability.

### **Billing and Payment**

Old (PGS-R-17):

- Bills consumption every ~30 days per standard rates.
- Excess energy credited at 150% of wholesale supplier's Energy Cost Adjustment (ECA).
- Credit distribution determined with wholesale supplier.

New (PGS-25):

- Bills consumption every ~30 days per standard rates.
- Excess energy credited at 100% of Victory's Avoided Cost (ECA or Locational Marginal Price).
- Annual crediting possible if using Locational Marginal Price.
- No invoicing for exported energy.

Key Differences:

- Reduces credit rate (100% vs. 150% of Avoided Cost).
- Introduces Locational Marginal Price and annual crediting option.
- Clarifies no invoicing for exports.

### **Definitions**

Old (PGS-R-17):

- Defines "Member-generator," "Renewable Energy Resources," and "Peak load."
- Member-generator requirements: renewable energy, capacity limits, location, parallel operation, safety standards, automatic disconnection.

New (PGS-25):

- Defines "Avoided Cost," "Distributed Energy System," "Export," and "Locational Marginal Price" (incomplete text).
- No explicit capacity limits or battery restrictions.

Key Differences:

- Shifts to “Distributed Energy System” and “Export,” broadening scope.
- Removes capacity limits from definitions.
- Adds billing-related definitions (Avoided Cost, Locational Marginal Price).

**Terms and Conditions**

Old (PGS-R-17):

- Detailed technical/safety requirements: meters, disconnect switches, insurance, interconnection contracts, application timelines.

New (PGS-25):

- References Interconnection Agreement Procedures (incomplete text).

Key Differences:

- Streamlines by referencing external procedures, reducing tariff details.