

**Virginia State Corporation Commission  
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<b>Case Name (if known)</b>	Petition of Appalachian Power Company for approval of a minimum bill, tariffs, and agreements to implement a shared solar program pursuant to Section 56-594.4 of the Code of Virginia
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May 12, 2025

**By Electronic Filing**

The Honorable Bernard Logan, Clerk  
Virginia State Corporation  
Commission Document Control Center  
1300 East Main Street  
Richmond, Virginia 23219

**Re:      Petition of Appalachian Power Company for approval of a minimum bill,  
             tariffs, and agreements to implement a shared solar program pursuant to  
             § 56-594.4 of the Code of Virginia  
             Case No. PUR-2025-00028**

Dear Mr. Logan:

Enclosed are the direct testimonies of Charlie Coggeshall and Anirudh Kshemendranath on behalf of Coalition for Community Solar to be filed in this matter.

Please do not hesitate to contact me if you have any questions.

Sincerely,

*/s/ Eric J. Wallace*

Eric J. Wallace

Enclosure

cc:      Counsel of Record (via E-Mail Delivery)  
            Office of Paralegals ([OHEParalegals@scc.virginia.gov](mailto:OHEParalegals@scc.virginia.gov))

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION**

<b>PETITION OF</b>	)	
	)	
<b>APPALACHIAN POWER COMPANY</b>	)	
	)	<b>CASE NO. PUR-2025-00028</b>
<b>For Approval of a Minimum Bill, Tariffs, and</b>	)	
<b>Agreements to Implement a Shared Solar</b>	)	
<b>Program, Pursuant to § 56-594.4 of the</b>	)	
<b>Code of Virginia</b>	)	

**DIRECT TESTIMONY OF CHARLIE COGGESHALL**

**ON BEHALF OF THE**

**COALITION FOR COMMUNITY SOLAR ACCESS**

May 12, 2025

### **Summary of Direct Testimony of Charlie Coggeshall**

My testimony begins by explaining the history of the Shared Solar Program in Virginia. I then discuss updates to the Shared Solar Program recently made by the General Assembly, including the establishment of the Appalachian Power Company (“APCo”) program. I explain the statutory differences between the existing Dominion Shared Solar Program and the new APCo Shared Solar Program and how these program differences impact the calculation of the APCo minimum bill, namely the lack of a low-income customer exemption and the requirement that Renewable Energy Credits (“RECs”) generated by a shared solar facility be transferred directly to APCo.

Finally, I discuss APCo’s minimum bill proposal and its related deficiencies. Ultimately, I explain that because the benefits of shared solar vastly outweigh the costs, the minimum bill for the APCo Shared Solar Program should be set at \$0.

**DIRECT TESTIMONY  
OF  
CHARLIE COGGESHALL  
ON BEHALF OF  
THE COALITION FOR COMMUNITY SOLAR ACCESS**

**BEFORE THE VIRGINIA STATE CORPORATION COMMISSION  
CASE NO. PUR-2025-00028**

**1 Q. PLEASE STATE YOUR NAME, BUSINESS NAME AND ADDRESS, AND ROLE  
2 IN THIS PROCEEDING.**

**3 A.** My name is Charlie Coggeshall, and I am the Mid-Atlantic Regional Director for the  
**4** Coalition for Community Solar Access (“CCSA”). CCSA’s business address is: 1380  
**5** Monroe Street NW, #721, Washington, D.C., 20010. My role in this proceeding is to serve  
**6** as an expert witness on policy for CCSA.

**7 Q. PLEASE SUMMARIZE YOUR EXPERIENCE AND EXPERTISE IN THE FIELD  
8 OF ELECTRIC UTILITY REGULATION AND THE RENEWABLE ENERGY  
9 FIELD.**

**10 A.** I completed a Bachelor of Science degree from the University of Vermont with a focus on  
**11** Community Development and Applied Economics, and a Master of Business  
**12** Administration from the University of Denver, Daniels College of Business, with a  
**13** concentration in Environmental Policy. In my current position as Mid-Atlantic Regional  
**14** Director for CCSA, I lead state-policy initiatives on behalf of the community solar industry  
**15** in Maryland, New Jersey, and Virginia. My work includes policy analysis, testifying before  
**16** legislative and regulatory bodies, and collaborating with utilities, state policymakers, and  
**17** other stakeholders to shape the design and implementation of community solar programs.

**18** My professional background in the energy space spans multiple sectors over the  
**19** past 17 years, from federal roles at the National Renewable Energy Laboratory and U.S.

1 Department of Energy, to state- and regional- focused energy policy positions in the private  
2 and non-profit sectors. My resume is attached hereto as Exhibit A.

3 **Q. HAVE YOU EVER TESTIFIED BEFORE THE VIRGINIA STATE**  
4 **CORPORATION COMMISSION OR OTHER REGULATORY AGENCIES?**

5 A. I have testified before the Oregon Public Utilities Commission (Docket No. UM 1930) and  
6 the Maryland Public Service Commission (Docket No. RM 56) on matters relating to  
7 community solar.

8 **Q. WHAT INFORMATION DID YOU REVIEW IN PREPARING THIS**  
9 **TESTIMONY?**

10 A. In preparing this testimony, I reviewed Virginia's shared solar statutes and regulations  
11 implementing the shared solar program in Virginia Electric & Power Company  
12 ("Dominion") and Appalachian Power Company ("APCo") service territories (the "Shared  
13 Solar Program"), as well as the prior State Corporation Commission ("Commission")  
14 shared solar proceeding.<sup>1</sup> I also reviewed a Dunskey Energy and Climate Advisors analysis,  
15 along with other cost-benefit analyses of shared solar in Virginia and other markets.

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. The purpose of my testimony is to discuss the statutory and regulatory background for the  
18 minimum bill and compare the APCo minimum bill framework under consideration in this  
19 proceeding with the existing minimum bill framework developed for the Shared Solar  
20 Program in Dominion's service territory. I compare the programs and discuss the  
21 overarching components used by APCo in its calculation of a minimum bill. Based on this  
22 discussion and the quantitative analysis completed by CCSA Witness Anirudh

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<sup>1</sup> Case No. PUR-2020-00125.

1 Kshemendranath, which demonstrate that the benefits of shared solar to the grid and to the  
 2 Commonwealth exceed its costs, I recommend that the Commission establish a minimum  
 3 bill of \$0.<sup>2</sup>

4 **Q. WHAT ARE YOUR CONCLUSIONS AND RECOMMENDATIONS REGARDING**  
 5 **THE MINIMUM BILL FOR THE APCO SHARED SOLAR PROGRAM?**

6 A. The minimum bill proposed by APCo does not adequately adhere to the cost-benefit  
 7 framework established under Va. Code § 56-594.4 D because it fails to incorporate  
 8 numerous benefits – both to the utility and society. By contrast, the more robust analysis  
 9 performed by Witness Kshemendranath demonstrates that the benefits of the Shared Solar  
 10 Program far exceed its total costs. Even when only accounting for the costs and benefits  
 11 specific to the utility and its grid, the program results in a net benefit, but when additional  
 12 societal benefits to the Commonwealth are considered, as required under Va. Code § 56-  
 13 594.4 D, the net benefit is compounded six times over. As a result, I recommend a minimum  
 14 bill of \$0 so that the subscribing customers are compensated fairly – via the full credit rate  
 15 – for the value being generated by shared solar facilities. This could be implemented as a  
 16 simple fixed figure which provides simplicity for customers and certainty for subscriber  
 17 organizations, or it could be calculated through APCo’s proposed minimum bill structure  
 18 so long as it utilizes a more comprehensive assessment of benefits.

19 Establishing a minimum bill of \$0 is consistent with the requirements of Va. Code  
 20 § 56-594.4 D to “calculate the benefits of shared solar to the electric grid and to the  
 21 Commonwealth” while “minimiz[ing] the costs shifted to customers not in a Shared Solar  
 22 Program.” Compared to APCo’s proposal, it also provides greater ability for the Shared

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<sup>2</sup> Va Code. § 56-594.4 D (requiring the Commission to deduct benefits of shared solar from the costs to establish the minimum bill).



Solar Program to “reasonably allow for the creation of shared solar facilities” and “allow all customer classes to participate in the program,” as required under Va. Code § 56-594.4 F 1 and 2. Under APCo’s current proposal, I am doubtful that any shared solar facility would be economically viable, much less provide customers an opportunity to participate in the program.

**Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE SHARED SOLAR PROGRAM IN VIRGINIA.**

A. The Shared Solar Program allows residential, commercial, and industrial customers to access the benefits of solar without installing solar panels at their premises. Participating customers enter into a subscription agreement with the operator of a shared solar facility to receive benefits associated with the facility’s energy output delivered to the utility grid. Compensation for the customer’s portion of the facility’s energy output is provided in the form of monthly bill credits applied toward electricity service charges, thereby reducing the customer’s electricity bill. In exchange, the customer pays a subscription charge to the subscriber organization that operates the shared solar facility. Subscription charges are assessed as a discount to the value of the bill credits that subscribers receive, so customers save money on their electricity bills by participating in shared solar.

**Q. HOW DID THE SHARED SOLAR PROGRAM IN VIRGINIA BEGIN?**

A. In 2020, the General Assembly passed the initial legislation to establish the Shared Solar Program.<sup>3</sup> The enabling legislation required the Commission to implement the Shared Solar Program in Dominion’s service territory by January 1, 2021.<sup>4</sup> The Commission initiated Case No. PUR-2020-00125 to promulgate regulations for implementation of the

<sup>3</sup> 2020 Va. Acts Chapter 1238, codified at Va. Code § 56-594.3.

<sup>4</sup> Va. Code § 56-594.3 F.



1 program (“the 2020 Proceeding”).<sup>5</sup> In December 2020, the Commission adopted  
 2 regulations in Chapter 340 establishing the regulatory framework for Dominion’s Shared  
 3 Solar Program.<sup>6</sup> At the direction of the Commission, Dominion filed a minimum bill  
 4 proposal on March 1, 2021.<sup>7</sup>

5 **Q. DID THE INITIAL SHARED SOLAR LEGISLATION FOR THE DOMINION**  
 6 **PROGRAM INCLUDE A MINIMUM BILL REQUIREMENT?**

7 A. Yes, the statute required the Commission to establish a minimum bill for all customers,  
 8 with the exception of low-income customers.<sup>8</sup> For the minimum bill, the statute required  
 9 the Commission to:<sup>9</sup>

- 10 • “include the costs of all utility infrastructure and services used to provide electric  
 11 service and administrative costs of the shared solar program.”
- 12 • “consider further costs the Commission deems relevant to ensure subscribing  
 13 customers pay a fair share of the costs of providing electric services” and
- 14 • “minimize the costs shifted to customers not in a shared solar program.”

15 The above statutory framework for the initial Dominion minimum bill did not require  
 16 consideration of the benefits of the Shared Solar Program. This omission represents a  
 17 critical difference between the initial minimum bill requirements for the Dominion Shared

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<sup>5</sup> See generally, *Commonwealth of Virginia, ex rel. State Corp. Comm’n, ex parte: In the Matter of Establishing Regulations for a Shared Solar Program pursuant to § 56-594.3 of the Code of Virginia*, Case No. PUR-2020-00125, Order Directing Comment (July 1, 2020) (“2020 Proceeding”).

<sup>6</sup> See generally, 2020 Proceeding, Order Adopting Rules (Dec. 23, 2020). On December 30, 2020, the Commission entered a Correcting Order in the same docket which revised a scribal error to page 13 of Attachment A of the Order Adopting Rules.

<sup>7</sup> 2020 Proceeding, Order Adopting Rules at 12 (Dec. 23, 2020); see also 2020 Proceeding, Minimum Bill Proposal of Virginia Elec. & Power Co., (Mar. 1, 2021).

<sup>8</sup> 2020 Va. Acts. Ch. 1238, codified at Va. Code § 56-594.3(D).

<sup>9</sup> *Id.*

Solar Program and the minimum bill requirements under consideration in the APCo Shared Solar Program.

**Q. WHAT WERE THE PROPOSED MINIMUM BILL STRUCTURES IN THE 2020 PROCEEDING?**

A. Four proposals emerged from the 2020 Proceeding, including:<sup>10</sup>

1) **Dominion's Proposal:** customers would pay all generation, transmission, and distribution charges minus an avoided energy and capacity cost credit against generation charges plus an administrative charge.

2) **CCSA's Proposal:** customers would pay Dominion's basic customer charge plus an amount associated with administrative costs, initially set at \$1 per month.

3) **Staff Alternative A:** customers would pay Dominion's basic customer charge, plus an amount associated with administrative costs, initially set at \$1 per month, plus all non-bypassable charges.

4) **Staff Alternative B:** customers would pay their standard tariff rates for all transmission and distribution charges, non-bypassable generation charges, and an amount associated with administrative costs, initially set at \$1 per month.

In addition to these basic differences between the proposals, it's notable that CCSA has consistently advocated for the minimum bill to be a floor from which a customer's bill could not go below, rather than an incremental charge that is automatically deducted from the bill credit value. CCSA has never viewed the intent of the minimum bill to act as a *de facto* mechanism for altering the bill credit value so that it results in a "net credit rate." Instead, CCSA recommends the minimum bill be established as its name implies: to be a

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<sup>10</sup> See 2020 Proceeding, Report of D. Mathias Roussy, Jr., Hearing Examiner at 36-37 (Feb. 16, 2022).

fixed minimum amount tied to the customer's usage that must always be paid to the utility, regardless of any bill credits generated through the customer's subscription to a shared solar facility. This is an important distinction that was unfortunately not adopted by the Commission in its determination of the minimum bill in 2021, but which I recommend reconsideration of in this proceeding.

**Q. WHAT MINIMUM BILL STRUCTURE DID THE COMMISSION APPROVE FOR THE DOMINION PROGRAM?**

A. The Commission established an initial minimum bill framework for Dominion that aligned most closely with Staff's Alternative B proposal.<sup>11</sup> The Commission approved a minimum bill consisting of the following fixed and volumetric costs:<sup>12</sup>

- *Fixed Costs*: customer charge and administrative charge.
- *Volumetric Costs*: statutorily non-bypassable generation charges, base distribution charges, distribution RAC charges, base transmission charges, and transmission RAC charges.

The Shared Solar Program has proceeded in Dominion territory under this minimum bill framework.<sup>13</sup> At the time the minimum bill was established, it was estimated to be approximately \$55 per month for the typical residential customer.<sup>14</sup>

**Q. TO YOUR KNOWLEDGE, HAS THE DOMINION SHARED SOLAR PROGRAM BEEN A SUCCESS?**

<sup>11</sup> 2020 Proceeding, Final Order, (July 7, 2022). The Commission subsequently issued an Order on Reconsideration, but it did not change the calculation of the minimum bill. 2020 Proceeding, Order on Reconsideration (Oct. 13, 2022).

<sup>12</sup> 2020 Proceeding, Final Order at 5 (July 7, 2022).

<sup>13</sup> See e.g., Virginia Elec. & Power Co., Schedule SS – Shared Solar, filed with the Commission on Aug. 13, 2024, available at: <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/shared-rates/schedule-ss-shared-solar.pdf?rev=c44e6b4da49b46cf95c01e9c68fadd79&hash=56239F4AAAFD6A97D8FEE6109DE338B5> (last accessed May 12, 2025).

<sup>14</sup> See 2020 Proceeding, Report of D. Mathias Roussy, Jr., Hearing Examiner at 24 (Feb. 16, 2022).



1 A. Yes, the initial phase (“Part 1”) of the Dominion program consisted of 200 MW of program  
 2 capacity, which is fully allocated to shared solar facilities.<sup>15</sup> There are fifty-three (53)  
 3 shared solar facilities in the queue for Part 1 of the program.<sup>16</sup> There are also eleven (11)  
 4 projects on the wait list for capacity awards under “Part 2” of the program.<sup>17</sup> Part 2 program  
 5 capacity will become available once 90% of the Part 1 capacity is subscribed and  
 6 construction of the shared solar facilities is substantially complete.<sup>18</sup>

7 **Q. HOW HAS THE MINIMUM BILL STRUCTURE IN THE DOMINION PROGRAM**  
 8 **WORKED OUT SO FAR?**

9 A. Not well. To my knowledge, the initial shared solar facilities in the Dominion program  
 10 began commercial operation in Spring 2024 and there appear to be several more now  
 11 online.<sup>19</sup> My understanding from shared solar companies participating in the Dominion  
 12 program is that the current shared solar facilities are exclusively serving low-income  
 13 customers, so those customers are exempt from the minimum bill. I am not aware of any  
 14 shared solar projects serving non-low-income residential, commercial, or industrial  
 15 customers. In the 2020 Proceeding, CCSA emphasized the importance of implementing a  
 16 reasonable minimum bill to enable all customer classes to participate in shared solar, as  
 17 mandated by the General Assembly.<sup>20</sup> However, the excessive minimum bill in place for

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<sup>15</sup> Va. Code § 56-594.3 E.

<sup>16</sup> Dominion Energy, Virginia, Renewable Energy Programs, Shared Solar Program, available at <https://www.dominionenergy.com/virginia/renewable-energy-programs/shared-solar-program> (last visited May. 12, 2025).

<sup>17</sup> *Id.*

<sup>18</sup> Va. Code § 56-594.3 E.

<sup>19</sup> Dominion Energy, Virginia, Renewable Energy Programs, Projects Awarded Capacity, available at <https://www.dominionenergy.com/virginia/renewable-energy-programs/shared-solar-program> (last visited May. 12, 2025).

<sup>20</sup> See Va. Code § 56-594.3 F (1) – (2) (requiring the Commission to ensure that any rule or utility implementation filing “reasonably allow for the creation of shared solar facilities” and “allow all customer classes to participate.”); see also 2020 Proceeding, Direct Testimony of Karl R. Rabago (Oct. 5, 2021); 2020 Proceeding, CCSA Post Hearing Brief (Jan. 13, 2021); 2020 Proceeding, CCSA Comments and Exceptions to the Report of Mathias Roussy, Jr., Hearing Examiner (Feb. 16, 2022).

1 the Dominion program undermines project economics and has not resulted in participation  
2 by shared solar subscribers that are subject to the minimum bill.

3 The expectation is that the entire Part 1 capacity of Dominion's Shared Solar  
4 Program will be built out and 100% subscribed to by low-income customers. While this  
5 achieves major clean energy and equity goals for the Commonwealth, it is also a strong  
6 market signal that the minimum bill would kill project economics. The APCo program does  
7 not provide any means of avoiding the minimum bill, which means if shared solar projects  
8 are not economically viable, then they simply won't get developed. APCo's current  
9 proposal of roughly \$50 for its minimum bill (for a typical residential customer), presents  
10 that very real risk to the program's viability.<sup>21</sup>

11 **Q. WHAT RECENT UPDATES HAS THE GENERAL ASSEMBLY MADE TO**  
12 **VIRGINIA'S SHARED SOLAR PROGRAM?**

13 A. During the 2024 session, the Virginia General Assembly enacted Chapters 715, 716, 763,  
14 and 765, which revised the shared solar statute for Dominion and added Va. Code § 56-  
15 594.4, establishing a shared solar program in APCo's service territory.<sup>22</sup> This legislation  
16 also directed the Commission to revise its rules for shared solar in Virginia and provided  
17 new guidance for the minimum bill calculation framework.

18 **Q. HOW DID THE COMMISSION RESPOND TO THE GENERAL ASSEMBLY'S**  
19 **NEW DIRECTIVE?**

20 A. Pursuant to the revised legislation, the Commission established docket number PUR-2024-  
21 00122 for the purposes of revising Chapter 340 of the Commission's regulations, 20 VAC

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<sup>21</sup> See Petition of Appalachian Power Co. Pursuant to Va. Code § 56-594.4 Proposing a Minimum Bill, Tariffs, and Agreements to Implement a Shared Solar Program at 5 (Apr. 1, 2025).

<sup>22</sup> 2024 Va. Acts Chapters 715, 716, 763, 786.

5-340-10 *et seq.*<sup>23</sup> Shortly thereafter, the Commission issued an Order Adopting Regulations, which included revisions to the shared solar regulations.<sup>24</sup> CCSA then filed a Petition for Reconsideration and Clarification, requesting that the Commission: (1) correct a scrivener’s error to 20 VAC 5-340-40 F 1; and (2) establish a timeline for initiating minimum bill proceedings for both Dominion and APCo under the new shared solar rules, such that the minimum bills will be established prior to the respective statutory filing deadlines.<sup>25</sup>

On February 10, 2025, the Commission entered an Order on Reconsideration taking the updated regulations out of suspension, accepting CCSA’s proposed revision to 20 VAC 5-340-40 F 1, and noting that it concurrently issued Orders initiating minimum bill proceedings for both Dominion and APCo under the new shared solar rules.<sup>26</sup> Pursuant to these Orders, on April 1, 2025, APCo filed its Petition Proposing a Minimum Bill, Tariffs, and Agreements to Implement a Shared Solar Program.<sup>27</sup>

**Q. HOW DO THE NEW STATUTES AND REGULATIONS CHANGE THE MINIMUM BILL CALCULATION FRAMEWORK?**

**A.** The revised statute for the Dominion Shared Solar Program and the new statute establishing the APCo Shared Solar Program alter the methodology that the Commission must use when

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<sup>23</sup> See generally, *Commonwealth of Virginia, ex rel. State Corp. Comm’n, ex parte: In the Matter of Amending Regulations Governing a Shared Solar Programs*, Case No. PUR-2024-00122, Order Establishing Proceeding (Aug. 8, 2024) (“2024 Proceeding”).

<sup>24</sup> See generally, 2024 Proceeding, Order Adopting Regulations (Nov. 25, 2024).

<sup>25</sup> See 2024 Proceeding, Petition for Reconsideration and Clarification of the Coalition for Community Solar Access at 7 (Dec. 12, 2024).

<sup>26</sup> See generally, 2024 Proceeding, Order on Reconsideration (Feb. 10, 2025); see also, *Commonwealth of Virginia ex rel. State Corp. Comm’n, ex parte: In the Matter of Future Minimum Bill Proceedings of Appalachian Power Company Pursuant to Code § 56-594.4*, Case No. PUR-2025-00028, Order Initiating Proceedings (Feb. 10, 2025) (“2025 APCo Proceeding”); *Commonwealth of Virginia ex rel. State Corp. Comm’n, ex parte: In the Matter of Future Minimum Bill Proceedings of Va. Elec. & Power Co. Pursuant to Code § 56-594.3*, Case No. PUR-2025-00031, Order Initiating Proceedings (Feb. 10, 2025) (“2025 Dominion Proceeding”).

<sup>27</sup> See 2025 APCo Proceeding, Petition of Appalachian Power Co. Pursuant to Va. Code § 56-594.4 Proposing a Minimum Bill, Tariffs, and Agreements to Implement a Shared Solar Program (Apr. 1, 2025).



determining the minimum bill. The primary change to the statutory minimum bill structure is the requirement that the Commission calculate the benefits of shared solar to the electric grid and to the Commonwealth.<sup>28</sup> These benefits must be deducted from the costs considered for the minimum bill:

establish a minimum bill, which shall include the costs of all utility infrastructure and services used to provide electric service and administrative costs of the shared solar program . . . In establishing the minimum bill, the Commission shall (i) consider further costs the Commission deems relevant to ensure subscribing customers pay a fair share of the costs of providing electric services, (ii) minimize the costs shifted to customers not in a shared solar program, and (iii) *calculate the benefits of shared solar to the electric grid and to the Commonwealth and deduct such benefits from other costs.*<sup>29</sup>

The minimum bill must include the costs of utility infrastructure and services to provide electric service and administrative costs. However, as related to establishing the minimum bill, the Commission also must consider:

- Further costs to ensure shared solar customers pay a fair share of the costs of electric service;
- Minimization of any cost shifting to customers not participating in the shared solar program; and
- The benefits of shared solar to the electric grid and to the Commonwealth.

Utilities must deduct shared solar benefits from the costs to establish the minimum bill.

<sup>28</sup> Va. Code §§ 56-594.3 D, 56-594.4 D.

<sup>29</sup> Va. Code § 56-594.4 D (emphasis added).

1           These requirements set forth by the General Assembly were included in the revised  
 2           Chapter 340 regulations.<sup>30</sup> Additionally, the Commission included a description of these  
 3           requirements in its February 2025 Order Initiating Proceedings.<sup>31</sup>

4   **Q.   WHAT ARE THE KEY DIFFERENCES IN THE DOMINION AND APCO**  
 5   **SHARED SOLAR PROGRAMS?**

6   **A.**   There are two key differences between the Dominion and APCo programs, particularly as  
 7           they relate to the calculation of the minimum bill.

8           *First*, under the Dominion program, low-income customers are exempt from paying  
 9           the minimum bill.<sup>32</sup> The General Assembly did not extend this exemption to the APCo  
 10          program. Therefore, all APCo customers must pay the minimum bill regardless of their  
 11          income.<sup>33</sup> The General Assembly did however include in the APCo program a “net  
 12          financial savings” requirement for low-income customers, mandating that they receive  
 13          savings of “at least 10 percent, relative to the subscription fee throughout the life of the  
 14          subscription.”<sup>34</sup> This net financial savings requirement for low-income customers is a  
 15          critical challenge because low-income customers are not exempt from the minimum bill.  
 16          If the minimum bill is set too high, it could first and foremost prevent any shared solar  
 17          facilities from being developed; however, if the project economics work but are on the  
 18          margin, it would likely result in the avoidance of low-income customer participation due  
 19          in part to this financial savings requirement.

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<sup>30</sup> See 20 VAC 5-340-80.

<sup>31</sup> See 2025 APCo Proceeding, Order Initiating Proceedings at 3 (Feb. 10, 2025).

<sup>32</sup> Va. Code § 56-594.3 D.

<sup>33</sup> Va. Code § 56-594.4 D.

<sup>34</sup> Va. Code § 56-594.4 F 15 (mandating that the Commission “Require net financial savings for low-income customers, as that term is defined in § 56-594.3, of at least 10 percent, relative to the subscription fee throughout the life of the subscription.”).

1           *Second*, ownership of the renewable energy credits (“RECs”) generated by shared  
 2 solar projects differ between the Dominion and APCo programs. In the Dominion program,  
 3 subscriber organizations that register a shared solar facility in the first 200 MW capacity  
 4 tranche of the program, or Part 1, own the RECs associated with such facility. However,  
 5 for facilities registered *after* the first 200 MW of awarded capacity, or Part 2, the subscriber  
 6 organization must transfer RECs to Dominion, to be retired for compliance with  
 7 Dominion’s Renewable Portfolio Standard (“RPS”) obligations.<sup>35</sup> Contrastingly, for APCo,  
 8 *all* RECs associated with shared solar facilities must be transferred to APCo to be retired  
 9 pursuant to its RPS obligations.<sup>36</sup>

10           This is a significant deviation from the Part 1 capacity in the Dominion program,  
 11 and notable for its implications on the minimum bill calculation. As discussed before, the  
 12 Commission is required to calculate “the benefits of shared solar to the electric grid and to  
 13 the Commonwealth and deduct such benefits from other costs” when establishing APCo’s  
 14 minimum bill.<sup>37</sup> Shared solar facilities serving APCo customers are required to transfer  
 15 their RECs to APCo to assist APCo in meeting its RPS compliance requirements: a  
 16 significant benefit both to APCo and to the Commonwealth.

17 **Q.   WHAT CHARGES DOES APCO PROPOSE TO INCLUDE IN THE MINIMUM**  
 18 **BILL?**

19 A.   APCo proposes to track the Commission’s adopted methodology from the 2020 Proceeding  
 20 under the prior statutory framework and include fixed and volumetric costs in the minimum  
 21 bill.<sup>38</sup> For fixed costs, APCo proposes to include the customer charge from the applicable

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<sup>35</sup> Va. Code § 56-594.3 B 7.

<sup>36</sup> *Id.*

<sup>37</sup> Va. Code § 56-594.4 D; 20 VAC 5-340-80(2)(c).

<sup>38</sup> *See* 2025 APCo Proceeding, Direct Testimony of Nicole M. Coon at 3 (Apr. 1, 2025).



tariff under which the subscribing customer takes service, and a fixed \$1 administrative charge.<sup>39</sup> For volumetric charges, APCo proposes to include: (1) base distribution charges; (2) distribution RAC charges; (3) transmission RAC charges; and (4) the five statutorily non-bypassable charges.<sup>40</sup>

**Q. WHAT BENEFITS DOES APCO PROPOSE TO INCLUDE IN THE MINIMUM BILL?**

A. APCo proposes that three benefits be included in the minimum bill, to be deducted from the above-mentioned costs. These benefits are: (1) Shifted Transmission Credit; (2) Ancillary Services Credit; and (3) REC Credit.<sup>41</sup>

For the Shifted Transmission Credit and Ancillary Services Credit, APCo proposes to use the avoided cost rates for transmission and ancillary services as determined in its ongoing net metering case.<sup>42</sup> For the REC Credit, APCo proposes to use the renewable energy premium charge in Optional Rider W.W.S. for the applicable subscriber's schedule as the credit to be applied for the RECs generated.<sup>43</sup>

**Q. DO YOU AGREE WITH APCO'S PROPOSAL FOR THE MINIMUM BILL?**

A. No. As discussed in detail by CCSA Witness Kshemendranath, APCo's minimum bill proposal is deficient in several ways, but most particularly in its failure to address key benefits that shared solar provides to both the grid and the Commonwealth. Once the missing benefits are added to the minimum bill calculation, the benefits outweigh the costs.

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<sup>39</sup> *Id.* at 4.

<sup>40</sup> *Id.* The five non-bypassable charges are: Rider Percentage of Income Payment Program (PIPP), Rider Broadband Capacity (BC) Rate Adjustment Clause (RAC), Rider RPS Compliance A.5, Rider PCAP Capacity A.5, and Rider Renewable Capacity A.6. *Id.* at 4-5.

<sup>41</sup> *Id.* at 3.

<sup>42</sup> *Id.* at 6. See generally *Petition of Appalachian Power Co. for Approval to Revise its Net Metering Program pursuant to § 56-594 of the Code of Virginia*, Case No. PUR-2024-00161.

<sup>43</sup> See 2025 APCo Proceeding, Direct Testimony of Nicole Coon at 6 (Apr. 1, 2025).

1           As this is consistent with the result of the cost-benefit calculation required by Va. Code §  
2           56-594.4 D, CCSA recommends that the Commission implement a minimum bill of \$0.

3    **Q.   DOES THIS CONCLUDE YOUR TESTIMONY?**

4    **A.   Yes.**

**Exhibit A**

Resume of Charlie Coggeshall



**CHARLES B. COGGESHALL**

1 Lynwood Rd, Asheville, NC 28804 ▪ 415-595-6119 ▪ [charliecoggeshall@gmail.com](mailto:charliecoggeshall@gmail.com)

**PROFILE**

- Over fifteen years of professional experience in: energy policy analysis; program design and implementation; and engagement with regulatory and legislative stakeholders at the state level.
- Undergraduate and graduate business degrees and experience in market and financial analysis.

**EXPERIENCE**

**Coalition for Community Solar Access (CCSA), Remote** April 2018 - Present  
Mid-Atlantic Regional Director (July 2022 – Present)

- Drive the community solar industry's policy initiatives in MD, NJ, and VA: managing CCSA's legal, lobby, and PR consultants and budgets; testifying before legislators and regulatory commissions; and engaging with utilities and other major stakeholders in the energy sector.
- Manage diverse - and sometimes competing - CCSA member interests; and organize and facilitate regular membership calls and presentations.

Director, Policy & Regulatory Affairs (April 2020 – June 2022)

- Managed the strategy and execution of CCSA's California policy campaigns, including the cultivation of major market stakeholders and ultimate passage of state legislation.
- Represented the solar industry at the Virginia SCC and with Dominion Energy on the economic, technical, and policy requirements tied to the state's shared solar program.
- Led successful negotiations with Portland General Electric, industry, and Oregon PUC, resolving a dispute over Qualifying Facility capacity in the state's community solar program.

Senior Policy Analyst, EQ Research / Consultant (primary client CCSA) (April 2018 – March 2020)

- Drove economic and interconnection policy solutions for Oregon's community solar program.
- Advised regional solar developers on project development and market strategy, including financial cash flow and interconnection analyses, and facilitating partnerships.

**Clean Energy Collective (CEC), Portland, OR** May 2015 – March 2018  
Senior Policy Analyst

- Drove the creation and development of Oregon's community solar program, including passage of legislation (2016), adoption of rules (2017), and initial implementation (2017/2018).
- Led CEC analysis and stakeholder engagement in the design and development of community solar regulations throughout the country (CA; HI; IL; MD; MN; OR; RI; SC; and WA).

**Southern Alliance for Clean Energy (SACE), Asheville, NC** November 2012 – April 2015  
Renewable Energy Manager

- Senior staff member responsible for solar policy and regulatory goals, including technical analyses, solar-supportive state legislation, regulatory dockets, and negotiations with utilities.

**U.S Department of Energy (Contract, New West Tech.), Washington, DC** April 2009 – June 2012  
Analyst II – In support of Energy Efficiency and Renewable Energy (EERE) Office of Weatherization and Intergovernmental Program and Building Tech. Program -- Jan 2012 – June 2012

- Developed economic analysis of federal issued waivers under ARRA Buy American provisions.
- Managed contractual requirements and execution of seven State Energy Program awardees of DOE's Better Buildings Neighborhood Program.

Energy Analyst & Task Lead – In support of DOE, Solar Energy Technologies Program (SETP) / SunShot Initiative-- April 2009 – Dec 2011

- Lead editor and coordinator of landmark DOE publication: *SunShot Vision Study* (2012): an in-depth assessment of the potential for solar technologies to meet a significant share of electricity demand in the United States.
- Developed metrics and scoring system for DOE's "Rooftop Solar Challenge," a national funding opportunity to reduce market barriers for rooftop solar deployment.

**Environmental and Energy Study Institute (EESI), Washington, DC** January 2009 – April 2009  
Energy and Climate Policy Intern

- Analyzed Congressional hearings and other legislative activities on energy and climate change.
- Principle researcher and author of EESI's weekly online report: *Climate Change News*.

**National Renewable Energy Laboratory (NREL), Golden, CO** June 2007 – April 2009  
Strategic Energy Analysis and Applications Center, Graduate Intern / Contractor

- Co-authored technical reports detailing innovative financing options for solar deployment.
- Developed performance metrics to evaluate the progress and impact of the Housing and Urban Development's (HUD) Partnership for Advanced Technology in Housing (PATH) program.

**Publicis & Hal Riney / Starcom Worldwide, San Francisco, CA** May 2003- April 2005  
Associate Media Planner

- Designed and executed marketing strategies for Sprint PCS's Consumer and B2B divisions.
- Established and maintained media relationships and negotiated annual contracts with local and national newspapers and magazines, such as *The New York Times* and *Fortune Magazine*.

## EDUCATION

**Daniels College of Business, University of Denver (DU), Denver, CO** Sept. 2006 – Aug. 2008  
Master of Business Administration (MBA) - Concentration in Environmental Policy

- Chief Sustainability Officer- (Graduate Assistant Position / Sept. '07 – Aug. '08)
- DU Sustainability Council (Graduate Student Representative / Sept. '07 – Aug. '08)
- Dean Search Committee (Graduate Student Representative / Sept. '07 – May '08)

**University of Vermont, Burlington, VT** 1997-2001  
Bachelor of Science (B.S.) – Community Development & Applied Economics (Minor in History)

## ACCOMPLISHMENTS & LEADERSHIP ACTIVITIES

- Board of Directors, Oregon Solar Energy Industries Association (2016 - 2019)
- Advisor for Blue Ridge Sustainability Institute (Sept 2012 – Mar 2013)
- Technical Achievement Award, New West Technologies (December 2010)
- Daniels Award for Excellence, Daniels College of Business, University of Denver (2008)
- Co-President of Net Impact, DU ('07 -'08). *2<sup>nd</sup> place in national campus greening initiative*
- Appalachian Trail – hiked to completion (2005-2006)

## PUBLICATIONS

U.S. Department of Energy. "SunShot Vision Study." DOE/GO-102012-3037. February 2012. Found at: <https://www.energy.gov/eere/solar/sunshot-vision-study>

Coggeshall, C.; Margolis, R. M. (2010). "Consortia Focused on Photovoltaic R&D, Manufacturing, and Testing: A Review of Existing Models and Structures." NREL Report TP-6A2-47866. Found at: <http://www.nrel.gov/analysis/pdfs/47866.pdf>

Cory, K.; Coggeshall, C.; Coughlin, J.; Kreycik, C. (2009). "Solar Photovoltaic Financing: Deployment by Federal Government Agencies." NREL Report No. TP-6A2-46397. Found at: <http://www.nrel.gov/analysis/pdfs/46397.pdf>

Mosey, G.; Doris, E.; Coggeshall, C.; Antes, M.; Ruch, J.; Mortensen, J. (2009). "Conceptual Soundness, Metric Development, Benchmarking, and Targeting for PATH Subprogram Evaluation." NREL Report No. TP-6A2-43822. Found at: <http://www.nrel.gov/analysis/pdfs/43822.pdf>

Cory, K.; Coughlin, J.; Coggeshall, C. (2008). "Solar Photovoltaic Financing: Deployment on Public Property by State and Local Governments." NREL Report No. TP-670-43115. Found at: <http://www.nrel.gov/analysis/pdfs/43115.pdf>