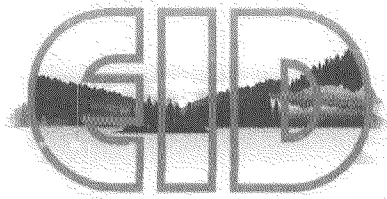


George W. Osborne – *President*  
Division 1

John P. Fraser – *Director*  
Division 2

Alan Day – *Director*  
Division 5



## El Dorado Irrigation District

George A. Wheeldon – *Vice President*  
Division 4

Bill George – *Director*  
Division 3

Jim Abercrombie  
*General Manager*

Thomas D. Cumpston  
*General Counsel*

In Reply, Refer to: EOL0913-248

September 3, 2013

VIA E-MAIL

Energy Division Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 95814  
[EDtariffunit@cpuc.ca.gov](mailto:EDtariffunit@cpuc.ca.gov)

SUBJECT: Draft Resolution E-4610, Letter to Request Adoption

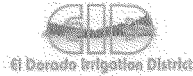
Energy Division Tariff Unit:

I am writing on behalf of El Dorado Irrigation District (District) in support of the Draft Resolution E-4610.

As background, the District installed a 1-megawatt solar array for net energy metering at our El Dorado Hills wastewater treatment plant (EDHWWTP) in 2006. The District's elected Board of Directors recognizes the use of solar energy to reduce the State's overall energy demand and that the installation and use of solar energy will save money for our ratepayers.

The EDHWWTP has a total of three meters on the plant site. One of those meters is utilized for the net energy metering from the solar array. During the months of peak production from the solar array, there is more energy produced from than is consumed on the District's side of the meter. Therefore, at the end of the 12-month true up period, the District has typically generated significantly more power than is consumed on-site by the one net meter. For example, during the June 2011 to May 2012 true up period, the District produced an excess of 276,800 kWh. The District's compensation for this excess energy production was a mere \$9,453; this amounts to a compensation of less than 4 cents per kWh of the excess energy produced.

The District investigated the option of breaking up the solar array and "net metering" from two meters at the EDHWWTP site. However, the costs to connect the solar array to the other on-site meter were in excess of \$250,000. In our view, this would be an unreasonable expenditure of public funds when net metering from the site seemed to be the obvious solution. The answer to our inability to net meter and receive sufficient compensation from the excess power that was generated came in Senate Bill 594 (SB 594).



SB 594 authorized eligible customer-generators with multiple meters to elect to aggregate the electrical load of the meters located on the property where the generation facility is located and on all property adjacent or contiguous to the property on which the generation facility is located, if those properties are solely owned, leased, or rented by the eligible customer-generator. The bill conditioned this authorization upon the Commission making a determination by September 30, 2013 that permitting eligible customer-generators to aggregate their load from multiple meters will not result in an increase in the expected revenue obligations of customers who are not eligible customer-generators.

In the Draft Resolution, E-4610, the Commission finds that allowing eligible customer-generators to aggregate their load from multiple meters, pursuant to SB 594, will not result in an increase in the expected revenue obligations of customers who are not eligible customer-generators.

The District is requesting that the Commission adopt Resolution E-4610 as written.  
Thank you for your support of alternative energy production.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth D. Wells".

Elizabeth D. Wells  
Engineering Manager

cc: Gabe Petlin, Energy Division, CPUC  
[gpl@cpuc.ca.gov](mailto:gpl@cpuc.ca.gov)

El Dorado Irrigation District:

Jim Abercrombie, General Manager  
Tom Cumpston, General Counsel  
Brian Mueller, Director of Engineering  
Vickie Caulfield, Wastewater/Recycled Water Manager