



# CALIFORNIA FARM BUREAU FEDERATION

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Sent via E-Mail

EDtariffunit@cpuc.ca.gov

September 5, 2013

ED Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Draft Resolution E-4610/Support for Adoption**

Energy Division Tariff Unit:

In accordance with the schedule established, the entities listed below (all of the listed entities have authorized California Farm Bureau Federation to submit this response on their behalf) support and urge adoption of Draft Resolution E-4610 without change, which addresses Senate Bill 594 (Wolk, 2012). Passed and signed into law in 2012, SB 594 authorized, within specified parameters, the ability of customers with multiple meters to aggregate the electrical load of the meters for purposes of net metering.

Draft Resolution E-4610 presents the required findings SB 594 directed be made prior to implementation. It verifies that allowing eligible net metering customer-generators, who aggregate their load, will not result in an increase in the expected revenue obligations of customers who are not eligible customer-generators. The findings are substantially supported by multiple levels of cost analysis, which elements have been consistently shown when the impacts of aggregation of eligible accounts are addressed. The assumptions made are reasonably based in pragmatic applications of how customers use their energy. For many customers the ability to aggregate provides a feasible path forward to match their load to an appropriate site for customer generation.

The thorough review of the matter made by Energy Division is evident and strongly supports approving the Draft Resolution. We appreciate the opportunity to

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comment and urge the Commission to expeditiously finalize the necessary requirements to allow customers to move forward with aggregation consistent with SB 594.

Respectfully submitted,



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cc: Michael Peevey, President  
Mike Florio, Commissioner  
Catherine Sandoval, Commissioner  
Mark Ferron, Commissioner  
Carla Peterman, Commissioner  
Gabe Petlin, [gp1@cpuc.ca.gov](mailto:gp1@cpuc.ca.gov)  
Rulemaking 12-11-005 Service List  
Mr. Edward Randolph, Director of the Energy Division  
Ms. Karen Clopton, Chief Administrative Law Judge  
Mr. Frank Lindh, General Counsel  
Senator Lois Wolk