

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.

Rulemaking 12-11-005

**COMMENTS ON THE ASSIGNED COMMISSIONER RULING REGARDING THE
INTERCONNECTION OF ENERGY STORAGE SYSTEMS PAIRED WITH RENEWABLE
GENERATORS ELIGIBLE FOR NET ENERGY METERING**

Elke Brazel

October 31, 2013

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I would like to urge the California Public Utilities Commission (CPUC) to issue a speedy and clear ruling regarding this matter and to stop utilities from keeping customers, solar installers, manufacturers and the progress of renewable energies hostage.

I am a homeowner and customer of Southern California Edison (SCE). I invested \$30,000 in a solar electric system, which has been sitting idle for most of the year because of SCE's denial of interconnection. The system was supposed to produce extra electricity during the summer months to offset winter usage, but so far it has been a waste of money and energy. The system includes a small battery backup for emergency situations and was installed by an experienced installer. For several years, this installer has installed many of these battery backup solar electric systems, and until now he has not had a single case when the utility did not allow his customer to interconnect under NEM. If I had been told at the beginning of the project that the battery backup could pose a problem, I would not have installed a solar electric system in the

first place. I would have bought a fossil fuel generator for emergencies instead. It would have been much cheaper.

I was told that SCE needs to “review” my equipment. Why does the utility need to review equipment, which has already been reviewed and approved by the California Energy Commission and which has been around and interconnected under NEM for several years? This should not be the utilities responsibility, especially if this “review” is at the customer’s and the installer’s expense.

If rules need to be changed and clarified in order to prevent future misinterpretation or misuse, a timely public notice should be made **before** parties make significant investments. Customers, installers and manufacturers should not be caught by surprise as long as they follow the old rules. Already interconnected solar electric systems with backup batteries and those already installed and waiting for interconnection under NEM should be grandfathered independent of this ruling.

Imagine you just bought a new car and now you are told that you must not drive it on public streets until a rule has been worked out! And once the rule has been worked out you may or may not have to pay an additional fee to modify the new car so it conforms to the altered rule! Is the dealer going to give you your money back or the car manufacturer? This type of rule making with disregard of the customer’s interest is despicable.

Please, speed this process up and reign in the utilities. Solar electric powered battery backup systems for residential emergency use are not the same as RPS envisioned mega energy storage

systems for whole city blocks. It would not surprise me, if my batteries could not power a single office in SCE's headquarters for one day!

Dated: October 31, 2013

Respectfully submitted,

/S/ ELKE BRAZEL

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