

**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

**MOTION FOR PARTY STATUS OF
Mark Smith CEO Solar Forward**

October 24, 2013

Mark Smith
CEO Solar Forward
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**MOTION FOR PARTY STATUS OF
Mark H Smith**

Mark H Smith respectfully moves for party status in this proceeding in accordance with Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”).

I. DESCRIPTION OF PARTY

I am CEO of Solar Forward in Santa Monica, CA 90405. In my home and office I have had an Outback Power battery backup solar system installed since 2002. My company, Solar Forward, installs solar battery backup systems for clients, both residences and business that are also customers of the Southern California Edison Company (SCE). Solar Forward has a great deal of experience with solar battery backup systems having installed and serviced Outback, SMA and Schneider products. Sunpower has granted Solar Forward “Elite Dealer Status” due to the high quality of our installations. I have visited Outback in Washington State and supervised the installation of over one thousand solar systems.

II. STATEMENT OF INTEREST IN THIS PROCEEDING

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The common goal for my clients and myself is to have uninterrupted power for critical circuits in the event of a power failure. Before installing a battery backup system in my home, I would experience an average of ten power failures a year. Often when the power failed, I had computers and video editing equipment lose data.

After I installed a battery backup system, the only hardship was to reset a few clocks. The longest power outage this year lasted over twenty hours. During this time I was able to continue to operate my business and live a normal life. My solar system is 4.6 kW with 10 kW-h of battery back up and is 95% more reliable than the SCE grid.

My clients run businesses with ten to fifty employees and they have experienced power failures that take their computers and servers offline. One company would run computer simulations that would crash with every power interruption and destroy a day's worth of work. Several companies have servers that service clients all over the world. It is unreasonable to expect a business to tolerate an interruption of electrical power that will seriously upset clients and jeopardize business operations. It is also unreasonable for a client of SCE to be penalized (by not being able to net meter excess day time generation) for taking on the additional expense of installing a solar system with battery backup.

Solar Forward currently has an interconnection application filed with Edison for a 36 kW solar system with 20 kW-h of battery back up in Santa Monica. This project is currently being installed and SCE is not responding to numerous requests for an engineer to

meet on site and move the interconnection process forward. This is interfering with our ability to conduct business. We have made numerous requests to SCE management to discuss this issue and the only response we have received since September 4, 2013 is that, "it is under review by management." I have called supervising engineers at Edison and never get a return call. I have spoken with an engineer at SCE who was clearly misinformed as to the operation of a solar battery backup system. He was told that the systems we would install could somehow be programmed to sell energy from the batteries to the grid during the day. When I explained that the systems we install are really just a large UPS (uninterrupted power supply) he was surprised and unable to justify the recent actions of SCE.

It is quite apparent that SCE has not made any effort to research or discuss their concerns with the solar industry. I have never seen nor heard of a "non export relay." Batteries are for emergency power, not selling. Our battery banks are too small and too expensive to be cycled every day and used for selling during peak times. Depleting an emergency battery defeats the security purpose of battery backup and is just an illogical proposition. There is one company that sells large 460 kW-h battery systems for \$600,000 that are designed for selling power back to the grid. To compare Outback, SMA or the other solar battery backup systems to this massive battery system is a leap of fear and ignorance.

Battery backup solar systems have the potential to save lives. In the event of an earthquake or other natural disaster, it is quite possible that solar battery backup systems will be the only source of power for some time.

It is only fair that solar battery backup systems are net metered in a fair manner just like all of decentralized solar power. The future will bring us more technological solutions. SCE needs to find a way to work with the solar industry and not against it.

III. NOTICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to Mark Smith at the address set forth below:

Mark Smith
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2204 Euclid St.
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mark.smith@solarforward.com

IV. CONCLUSION

Mark Smith's and Solar Forward's participation in this proceeding will not prejudice any party, and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Mark Smith and Solar Forward respectfully request that the Commission grant this Motion for Party Status and direct the Commission's Docket Office to accept the comments of Mark Smith and Solar Forward for filing.

Dated: October 24, 2013

Respectfully submitted,

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