

**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

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

November 7, 2013

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Rulemaking 12-11-005

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

I. Introduction

I appreciate the opportunity to reply to comments on the *Assigned Commissioner Ruling Regarding The Interconnection Of Energy Storage Systems Paired With Renewable Generators Eligible For Net Energy Metering* (ACR) and look forward to a timely decision.

II. Ask the CEC

Almost all commercially available inverters for grid tied photovoltaic (PV) systems cannot be configured to use any kind of energy storage. Only a small number of available grid tied PV inverters have battery backup. Outback Power, SMA-America, and Schneider Electric are three manufactures of PV inverters with battery backup. Can the California Energy Commission (CEC) be asked if this small number of PV inverters with batter backup meet the Renewables Portfolio Standard? The CEC could make a list of approved inverters with energy storage that are eligible for standard Net Energy Metering (NEM) agreements with all California utilities.

The CEC already maintains a list of renewable energy equipment eligible for incentive rebates per SB1. These PV inverters with battery backup are on that list. Furthermore, these PV inverters can only be installed in a limited number of configurations. Each configuration could be reviewed once and not dissected by a utility for every NEM application.

III. Conclusion

If the utilities have concerns about eligible equipment, their concerns should be resolved with the CPUC and CEC before customers are denied NEM interconnection agreements for installed equipment. A timely decision is needed.

Dated: November 7, 2013

Respectfully submitted,

/s/ Charles Hewitt

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