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November 12, 2013

ED Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

Re: SolarCity Corporation's Protest to: Pacific Gas and Electric Company Advice 4305-E, Revise Electric Rate Schedule NEM and Establish a New Electric Sample Form for NEM for Load Aggregation Pursuant to Senate Bill 594 and Resolution E-4610; San Diego Gas & Electric Company Advice 2529-E, Modification of SDG&E's Net Energy Metering Tariffs and Related Forms Pursuant to Senate Bill 594 and Resolution E-4610; Southern California Edison Company Advice 2952, Modifications to SCE's Net Energy Metering Tariffs to Enable Multiple Meter Aggregation Pursuant to Senate Bill 594 (Wolk, 2012) and Resolution E-4610

Dear Energy Division Tariff Unit,

SolarCity Corporation (SolarCity)¹ respectfully submits this Protest to Advice Letters 4305-E (PG&E), 2952-E (SCE), and 2529-E (SDG&E), filed on October 21, 2013, pursuant to Resolution E-4610. The Advice Letters propose modifications to the Investor Owned Utilities' (IOUs) Net Energy Metering (NEM) tariffs in order to implement Senate Bill (SB) 594.

Background

Senate Bill 594 (Wolk, 2012) provides a means for customers with multiple meters located on one or more parcels of neighboring lands to aggregate loads for purposes of sizing customer-side renewable generation to serve the aggregate load served by those meters. This meter aggregation

¹ SolarCity is California's leading full service solar power and energy efficiency provider and provides cost effective financing that enables homeowners, business and government organizations to eliminate the high upfront costs of solar and efficiency improvements. SolarCity has more than 2000 California employees based at 17 facilities around the state and has provided clean energy services to more than 30,000 California customers.

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program, SolarCity agrees with Récolte’s suggestion that PG&E’s Advice Letter should become effective upon approval rather than PG&E’s proposed 120 days after the date of approval. We believe this should also apply to the Advice Letter filings of the other utilities. As Récolte notes, because of the project development timelines, an earlier effective date will provide the regulatory certainty needed for entities to initiate project development activities, but provide ample time for the utilities to get the necessary billing and other programmatic infrastructure in place.

Conclusion

SolarCity appreciates the opportunity to provide feedback on the IOUs’ Advice Letters implementing SB 594.

Respectfully submitted this 12th day of November, 2013,

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