

**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

**OPENING COMMENTS ON THE ASSIGNED COMMISSIONER RULING REGARDING  
THE ESTABLISHMENT OF A NET ENERGY METERING TRANSITION PERIOD**

December 12, 2013

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**I. Introduction**

I appreciate the opportunity to comment on the *Assigned Commissioner Ruling Regarding The Establishment of a Net Energy Metering Transition Period* (ACR) and look forward to a timely decision. I am a homeowner with a small 3.5kW grid tied battery backup photovoltaic (PV) system. I am employed as an engineer not by any PV installer, equipment manufacturer, utility, or government entity. I am a customer and am waiting for a decision on the Interconnection of Energy Storage Systems Paired with Renewable Generators Eligible for Net Metering.

**II. Transition to What?**

A major factor in a decision to purchase a renewable energy (RE) generating system is the future return on the investment. Neither RE installers, the utilities, nor the California Public Utilities Commission (CPUC) notified potential buyers that the standard Net Energy Metering (NEM) tariff could change during the life of the investment. Customers purchased RE systems with the reasonable expectation that the laws of the State of California would guarantee the

current NEM tariff for the life of their RE systems. Therefore, each RE system must be guaranteed the current NEM tariff for the actual life of each system – not the expected life – until the equipment can no longer function as a RE generator after the original warranty has expired.

The impact of a change to the NEM tariff to homeowners with small RE systems is serious as future returns may not even recover their initial investments. This ACR should consider a separate transition policy for small RE systems to mitigate the impact.

Dated: December 12, 2013

Respectfully submitted,

/s/ Charles Hewitt

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