

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

Order Policies, California Incentive Generation	Instituting Procedures Solar Program Issues.	Rulemaking and Initiative, and Other	Rule - General Other	RULEMAKING Filed Self Distributed	November 8,	12 - 2012)
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**OPENING COMMENTS OF THE CALIFORNIA
AGRICULTURE NETWORK THE ASSIGNED COMMISSIONER
RULING REGARDING THE ESTABLISHMENT OF A
METERING TRANSITION PERIOD**

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OPENING COMMENTS OF THE CALIFORNIA CLIMATE AGRICULTURE NETWORK ON THE ESTABLISHMENT OF ASSIGNED PERIOD

I. SUMMARY

The California Climate and Agriculture Network (CalCAN) represents sustainable agriculture organizations that advances policy solutions for climate change and sustainable agriculture. Our coalition member organizations such as the Community Alliance with California Certified Organic Farmers and the Ecological Farming Project representing several thousand farms and ranches in California. Many of these farms and ranches have made renewable energy systems and Net Participative Energy in Metering (NEM) program. California's agricultural leadership in renewable energy production¹, and their play contributions important role in NEM program goals in California Utilities Public Code Section 2827(a). However, their confidence in the NEM program, as well

¹ http://www.agcensus.usda.gov/Publications/Energy_Production_Survey/

lead the on nationfarm in renewable energy installations, fair is co
implementation process of Assembly Bill (AB) 327.

We are therefore submit pleasedr topening comments on
Commissioner's Ruling Regarding the Establishment of a

II. COMMENTS ON ACR QUESTIONS REGARDING NEM

We have ed review questions posed by Commissioner
ruling dated November 27, 2013 and respectfully offer tl

A. TRANSITION PERIOD SHOULD BE AT LEAST 30 TO EXPECTED SYSTEM LIFE

CalCAN strongly recommends that the length of tl
transition should consider expected system life rather than
payback period.

For both current and prospective operators, NEM certainty in
long - - - term viability of their investments is of the
post - - - transition program has yet to be designed, an
based on expected system life - - - generators thirdw a customer perio
uncertainty in their investments. The State should be
distributed renewable technologies, rather than casting their

Given this, we recommend that the commission co
years, if not longer, for the transition period under
National Renewable Energy Laboratory (NREL) has estimated p
systems' expected lifetimes at 30 years based on a

published literature. Given that 99% of current NEM accounts (according to the CPUC/E3's Impacts³), customers feel this an appropriate transition period length for the Commission. A minimum transition period of 30 years or the understanding under which current NEM customer investments, and it is the only way to provide between now and when the 5% cap (or July

B. ORIGINAL EQUIPMENT MANUFACTURERS' SYSTEM INSTALLERS' WARRANTIES SHOULD BE THE ONLY WARRANTIES OPERATIONAL LIFE OF THE SYSTEM SHOULD BE SUPERSEDED

We respectfully observe that the warranty requirement Util. § 3875(d)(4) is a directive to the local publicly equipment manufacturers or generators. It is intended to acceptable warranty lengths and should not be reference transition period. Most generators will not be familiar requirement in statute, and will have made their Original Equipment Manufacturer's (OEM) warranty, which is a half times the length set for solar photovoltaic systems. Virtually all of the solar system designers familiar use this 25-year system warranty as the their customer transactions.

² "Life Cycle Greenhouse Gas Emissions from Solar Photovoltaics." NREL Accessible online at <http://www.nrel.gov/docs/fy13osti/56487.pdf>

³ http://www.cpuc.ca.gov/NR/rdonlyres/75573B69_D5C8_45D3_BE22-3074EAB16D87/0/NEMReport.pdf

We therefore recommend that the ten - - - year warra
 irrelevant to the matter of this transition period. V
 to consider that no product is warrantied for its
 of a system should extend well past the designated

C. INTERCONNECTION AS DATE START OF EXPECTED SINGULAR LIFE, TRANSITION DATE FOR ALL SYSTEMS, ARE ADVISABLE

We support a determination that the reasonable e
 begins on the date of system interconnection.

Alternatively, to avoid confusion regarding the 'start'
 period for each system, as well as the difficulty
 'expected payback period' for these purposes, the Comm
 option *al*that systems, regardless of the date they began
 tariff, would transition on the same future date.

D. REASONABLE EXPECTED PAYBACK PERIOD SHOULD CUSTOMER TYPE OR SYSTEM SIZE

We recommend that the reasonable expected payback
 the Commission not vary for different types of cus
 many different variables in any calculation of a "re
 period", which can differ - - - widely - system basis. system

In Governor Brown's signing statement for Assembly
 recommended that s customer "protected under *expected* those *life* rules

of their systems.” the at reason (A) regarding investment certain
other factors, we strongly support the Governor’s expect

**E. SYSTEM MODIFICATIONS SHOULD OF BE NEM TRANSITION T
AVOID INADVERTENT DISINCENTIVES TO RENEWABLE ENERGY
INVESTMENT**

We recommend that all modifications to a NEM
or July 1, 2017, be isubsumed under the NEM contrac
initial system installation. All modifications would then be
transition date as the initial equipment. We view t
treat modifications under the transition period.

In deciding how to treat modifications under the
that great care be taken not to provide inadverten
existing renewable energy investments.

III. CONCLUSION

These comments are submitted by CalCAN to pro
and ranch operators on their experiences with the
their considerable investments in distributed renewable energ
the NEM transition period not devalue existing renewable ener
that it also not investment disincentive expansion of existing
We strongly encourage the Commission to determine a
NEM transition, placed on expected disincentives life, avoiding
expansion of existing installations.

⁴ Signing statement http://www.sbc.ca.gov/docs/AB_327_2013_Signing_Message.pdf

We appreciate the Commission's timely to ruling void on investment uncertainty, and look forward to participating

Executed December 13, 2013 in Sacramento, CA

Respectfully Submitted,



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