



# CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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Sent via E-Mail  
EDtariffunit@cpuc.ca.gov

January 21, 2014

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Response of California Farm Bureau Federation to Utility Advice Letters Related to Senate Bill 594 and Resolution E-4610/SDG&E AL 2529-E-A, SCE AL 2952-E-A, and PG&E AL 4305-E-A**

Dear Energy Division Tariff Unit:

The California Farm Bureau Federation ("Farm Bureau")<sup>1</sup> submits this response to the partial supplemental advice letters submitted by San Diego Gas and Electric Company, Southern California Edison and Pacific Gas and Electric Company for implementation of Senate Bill 594 and CPUC Resolution E-4610 to support the effective implementation of net metering aggregation for electric customers.

Farm Bureau appreciates the efforts undertaken to find a common approach for implementation of the statute and Resolution. Recognition of customers' interest in the aggregation option and willingness to seek an approved program as soon as possible, as PG&E made clear, bodes well for a positive commencement of the process and is much appreciated. The supplemental advice letters make changes to key areas of the original advice letters implementing aggregation for NEM, which changes make significant progress toward the implementation in line with the directives of the Resolution.

With the submission of these supplemental advice letters, significant issues have been resolved which were raised by Farm Bureau and other parties, including: 1) the questions of which parcels are considered contiguous and adjacent for purposes of NEM aggregation; and 2) the bill credit allocation methodology. Edison and PG&E's inclusion of the illustrative diagrams in their proposed tariffs are particularly helpful to facilitate clarity for most situations.

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<sup>1</sup> The California Farm Bureau Federation is California's largest farm organization with approximately 78,000 agricultural and associate members in 53 county Farm Bureaus. California farmers and ranchers sell \$44.7 billion in agricultural products annually, accounting for hundreds of thousands of jobs in California. Farm Bureau's members expect to pay in excess of \$850 million for their electric service.

NANCY N. McDONOUGH, GENERAL COUNSEL

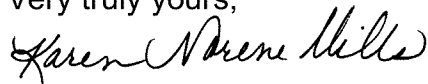
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Although Farm Bureau raised questions about the billing service fees in its protest to the original advice letters, the challenge of finding a fair balance that allows an ability to move forward, while at the same time assessing fair billing costs, must be recognized. PG&E's and SDG&E's approaches to the issue are consistent with the concerns we raised, as long as existing customers will not be assessed for after-the-fact increases. That the methodologies and resulting cost estimates have not been subject to review, underscores the need for a transparent process to develop justifiable fees for services. Such concerns have been ameliorated as all utilities have agreed to the establishment of a process that would subject the actual claimed costs to inquiry prior to final establishment in order to find the balance between actual and projected costs. Like the utilities and other parties, Farm Bureau seeks an equitable approach to balance the effects of the fees on both non-participating and participating customers in the program.

Aggregation for net metering purposes in particular addresses the unique constraints of agricultural businesses, delivering a pragmatic solution to otherwise insurmountable limitations to utilizing renewable energy on-site. Farm Bureau appreciates the Commission's and other parties' efforts in moving forward expeditiously with the program.

Very truly yours,



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KNM/pkh

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Megan Scott-Kakures, Southern California Edison Company (via USPS & e-mail)  
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Rulemaking 12-11-005 Service List (via e-mail)  
Rulemaking 10-05-004 Service List (via e-mail)