

캘리포니아
캘리포니아
January 2014
캘리포니아
CPUC, Energy Division
Attn: Tariff Unit
505 Van Ness Ave
San Francisco, CA 94102
캘리포니아

Subject: CALSEIA PROTEST OF NEM ADVOCATE MEMBERS FROM SOUTHERN CALIFORNIA EDISON SAN DIEGO GAS & ELECTRIC

1. Introduction

With this letter, the California Solar Energy Solar Energy (CALSEIA) protests Advice Letter 2952-E-A from Southern and Advice Letter 2529-E-A from San Diego Gas & Electric, based on excessive metering and set-up fees.

CALSEIA supports the Energy Division analysis showing fees for meter aggregation to be \$25 per benefiting aggregation group, plus ongoing fees of \$500 per metering principle, we maintain that set-up charges and billing on project economics and involved the statutory requirements Energy Division has taken a reasonable middle

2. The excessive fees proposed and by SCE eliminate the viability of many of the types of projects that the NEM is intended to support.

In its Advice Letter, SCE proposed a metering fee of \$25 per aggregated meter and \$500 per aggregation group, and an ongoing metering fee of \$200 per meter. These fees are excessive and will impact project economics.

As an example, an agricultural operation is currently aggregating 28 meters. Under the SCE proposal, this would result in ongoing fees of \$14,000 per year. SCE's proposal is not in the best interest of the public. SCE's proposal is not in the best interest of the public. SCE's proposal is not in the best interest of the public.

¹ California Public Utilities Energy Division Requested Changes to PG&E's SCE Advice Letter 2529-E-A SDG&E Letter 2529-E-A, dated 11/16/2013.

웹
웹

difference of more than \$200,000 in current dollars on the project. The project would not go forward with hard to believe that it would cost more than \$20

Another CALSEIA member company has completed five pre buildings with 50 to 200 units. The net cost per dual is approximately \$20 a \$20 billing fee would more than would have made those projects uneconomic.

Although the SDG&E fee proposal would cost less over also block good projects. In a multi-family residential ratepayers are paying the fees, the net cost is \$20 per dual families. Property owners would therefore be likely to solar project.

It is not a burden on the Gas & Electric fees that match Energy Division. It is clearly that it is possible to bill without excessive fees that would eliminate the viability of

A \$20 billing fee is also contradictory with AB 3. fixed charges for residential service not exceed \$10 per aggregation tariff will be beneficial for apartment buildings, that apply to the tariff.

Recommendation: CALSEIA urges the Commission to require Diego to allow ratepayers to pay the \$5 monthly installments. We urge the Commission to Southern California to reduce its monthly fee to

3. Systems should be allowed to offset the demand of the aggregated site for CSI eligibility.

As it stands, California Solar INEM (CSI) incentives will be limited based on the load of the physical generating account. For example, for aggregated 100 kW load each, the net cost is \$20 per kW. A 300 kW system could be designed up to 300 kW for the

Recommendation: Meter aggregation projects should be limited by the 1 MW meter limit by the CSI Program. For meter aggregation projects, the benefiting accounts and the net cost should be considered for purposes of sizing calculation.

² See the "Advice Letter" report, July 2014.

웹
웹
웹

Thank you for the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Bernadette Del Chiaro". The signature is fluid and cursive, with the first name being the most prominent.

Bernadette Del Chiaro
Executive Director

cc: President Michael R. Peevey
Edward Randolph, Director, Energy Division
Megan Scott-Kakures, SCE
Leslie E. Starck, SCE
Service list of R.12-11-005