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WEB

January 2014

WEB

CPUC, Energy Division

Attn: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

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Subject: CALSEA PROTEST OF NEM ADDITION FEES FROM SOUTHERN CALIFORNIA Edison SAN DIEGO GAS & ELECTRIC

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1. Introduction

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With this letter, the California Solar Energy Solar Energy (CALSEA) protests Advice Letter 2952- E- A from the Southern and Advice Letter 2529- E- A from San Diego Gas fees.

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CALSEA supports the Energy Division showing fees for meter aggregation to be \$25 per benefitting aggregation group, plus ongoing fees per meter. This principle, we maintain that set- up charges and billing on project economics and statutory requirements. Energy Division has taken a reasonable middle ground.

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

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In its Advice Letter 2952- E- A, the fee of \$25 per aggregated at \$500 per meter aggregation group, and ongoing fees per SDG&E proposal. A one- time meter fee is proposed. These fees are excessive and have no project economics.

As an example, an agricultural operation is currently aggregating 28 meters. Under the SCE proposal, this is in ongoing fees, as has been proposed by the Division. This is a fee of \$25 per meter. The California Public Utilities Energy Requested Changes to PG&E's SCE Advice Letter 2952- E- A on January 16, 2013.

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memberId meter memberId for memberId purposes memberId of memberId sizing memberId calculation.
 memberId memberId "Advice memberId Letter," memberId January memberId 2014.

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Thank you for the opportunity to submit these comments.

Respectfully,



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