

**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

**COMMENTS ON THE ASSIGNED COMMISSIONER RULING REGARDING THE  
INTERCONNECTION OF ENERGY STORAGE SYSTEMS PAIRED WITH RENEWABLE  
GENERATORS ELIGIBLE FOR NET ENERGY METERING**

January 8, 2014

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This filing is in response to the December 10<sup>th</sup>, 2013 email from President Peevey's advisor, Scott Murtishaw.

May I ask the commissioner to, please, keep this discussion focused on the immediate issues on hand. It appears that certain interests are trying to distract the commission. The question about the safety of battery backup systems has been answered.

Luckily, in this country, we do have agencies with qualified personnel, who evaluate the safety of commercially available electrical equipment. Underwriters Laboratories (UL), the Institute of Electrical and Electronics Engineers (IEEE) with its National Electric Code (NEC) and the California Energy Commission (CEC), all have carefully tested and evaluated commercially manufactured solar electric systems including those with battery backup. Currently available battery backup systems have been found safe to be operated in utility interconnected

situations by experts in the field. It is a waste of time and money to try to duplicate this tedious evaluation process in this discussion, where parties appear to have expertise primarily in the legal field and in administration but with no background in electrical systems. Let engineers do their job and lawyers do theirs. Battery backup systems are safe, just look it up in the newest edition of the NEC handbook and in the UL and CEC listings. Unfortunately, one gets the impression that there is not a single electrical engineer or electrician with first hand solar electric experience on the entire CPUC staff. Get him or her engaged immediately or hire one. It will save money, time and unnecessary frustration in the long run.

To discuss safety implications of possible future backup scenarios is a distraction from current pressing issues. There will always be changes in technologies as time goes by. The experts at the aforementioned regulatory agencies will evaluate those as well, as they become available. In the meantime, we utility customers, who had UL and CEC listed, NEC compliant battery backup solar electric systems installed last year and have been waiting for almost an entire year for our simple NEM agreement with the utilities, are running out of patience. We did nothing different from hundreds of other customers with the very same battery backup systems, which have been under simple NEM agreements for years. The utilities claim the battery backup systems have changed. Really? Where is the CPUC expert to independently evaluate this claim? I personally have stood in front of a battery backup system, which has been operated under a simple NEM agreement for years. There was no trouble with the utility when it was installed. My own system is no different, nothing has changed, just compare the circuit diagrams. It is self evident!

Why is it taking so long to get customers with pending applications on line? Is the threat of a class action lawsuit necessary to speed up the process? Misleading the public, solar electric installers, manufacturers and utility customers alike, and the discrimination against some battery backup customers but not all must stop now!

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Respectfully submitted,

/S/ ELKE BRAZEL

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