

June 23, 2014

Edward Randolph, Director
Energy Division, Room 4004
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

Re: Draft Resolution E-4665. Modifications to Southern California Edison Company (SCE), and San Diego Gas & Electric (SDG&E) Net Energy Metering (NEM) Tariffs to Enable Multiple Meter Aggregation Pursuant to Senate Bill (SB) 594 (Wolk, 2012) and Resolution E-4610

Dear Mr. Randolph:

By way of this letter, the Solar Energy Industries Association (SEIA)¹ comments on the above referenced Draft Resolution. Through the Draft Resolution, the Commission approves the changes to San Diego Gas & Electric Company's (SDG&E) and Southern California Edison Company's (SCE) respective Net Energy Metering (NEM) tariffs necessary to implement NEM aggregation.

As noted in the Draft Resolution, since the initial advice filings by SCE and SDG&E proposing tariff changes to enable NEM aggregation, the two utilities worked with Energy Division to resolve a majority of the issues raised by parties in protests, including those raised by SEIA. The amended advice filings submitted by SCE and SDG&E reflected such outcome.

The Draft Resolution serves to address the remaining concerns which SEIA had with SCE's and SDG&E's submittals. With that said, however, SEIA would note that one of the issues it raised --the treatment of prospective NEM aggregation customers that receive a CSI incentive reservation for more than one renewable electrical generating facility (*i.e.*, generating account) on a single property -- has been referred to the Energy Division and Program Administrators (PAs) of the CSI to address.² While SEIA recognizes the need to address this issue through an amendment to the CSI Handbook, it would request that this issue be addressed expeditiously so that the lack of clarity on this issue will not serve as an impediment for certain customers to avail themselves of the benefits of NEM aggregation.

¹ The comments contained in this filing represent the position of the Solar Energy Industry Association as an organization, but not necessarily the views of any particular member with respect to any issue.

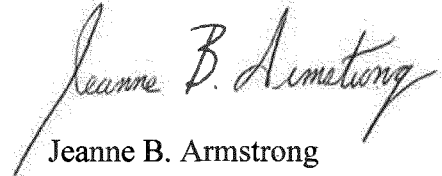
² Draft Resolution, p. 30.

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Thank you for your consideration of these comments.

Very truly yours,

GOODIN, MACBRIDE, SQUERI,
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Jeanne B. Armstrong

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Industries Association

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