



June 23, 2014

Via U.S. First Class Mail and email to edtariffunit@cpuc.ca.gov

ED Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments of California Center for Sustainable Energy on Draft Resolution E-4665

The California Center for Sustainable Energy (CCSE) hereby provides comments on Draft Resolution E-4665 (Draft Resolution), which proposes to approve with modifications Southern California Edison Company (SCE) Advice Letter 2952-E, SCE Advice Letter 2952-E-A, San Diego Gas & Electric Company (SDG&E) Advice Letter 2529-E, and SDG&E Advice Letter 2529-E-A, implementing NEM aggregation pursuant to SB 594 and Resolution E-4610.

INTRODUCTION

CCSE commends the Commission and Energy Division staff for their extensive consideration of SCE Advice Letter 2952-E, SCE Advice Letter 2952-E-A, SDG&E Advice Letter 2529-E and SDG&E Advice Letter 2529-E-A, implementing NEM aggregation pursuant to SB 594 and Resolution E-4610, as well as the Protests to the aforementioned Advice Letters received from interested parties.

CCSE supports the Draft Resolution but urges the Commission to include additional clarification in finalizing the Draft Resolution. Accordingly, CCSE provides the following comments for consideration by the Commission:

- With respect to “Issue 3: Billing Service Charges”, CCSE encourages the Commission to ensure that all fees are transparent and urges the Commission to explicitly state that no other additional fees beyond the \$25 per account set-up fee and not to exceed \$5 per account monthly billing fee will be permitted.
- With respect to “Issue 7: California Solar Initiative (CSI) Application Treatment”, CCSE proposes that the appropriate vehicle to address whether CSI incentives can be applied to a generator sized to offset the entire aggregated load is an advice filing to propose necessary revisions to the CSI Program Handbook.

COMMENTS

I. With respect to “Issue 3: Billing Service Charges”, CCSE encourages the Commission to ensure that all fees are transparent and urges the Commission to explicitly state that no other additional fees beyond the \$25 per account set-up fee and not to exceed \$5 per account monthly billing fee will be permitted.

CCSE supports the Commission’s adoption of the same fee structure for SCE and SDG&E as the one approved for PG&E: not to exceed \$25 per account set-up (capped at \$500 per NEMA arrangement), and not to exceed \$5 per account monthly billing fee. CCSE believes the adopted fee structure is reasonable. Furthermore, consistency among the IOU service territories is important.

Nevertheless, acknowledging the concerns previously expressed by protesting parties regarding the lack of cost causation and justification and arbitrary derivation of billing service charges, CCSE encourages the Commission to ensure that all fees are entirely transparent and that there are no hidden fees. Accordingly, CCSE urges the Commission to explicitly state in the Resolution that no other additional fees beyond the \$25 per account set-up fee and not to exceed \$5 per account monthly billing fee will be permitted. Moreover, to provide even greater transparency, CCSE urges the Commission to serve data requests on each of the IOUs to require each IOU to thoroughly explain the present capabilities of their VNM billing systems and what additional capabilities are needed to upgrade the system to handle NEMA.

II. With respect to “Issue 7: California Solar Initiative (CSI) Application Treatment”, CCSE proposes that the appropriate vehicle to address whether CSI incentives can be applied to a generator sized to offset the entire aggregated load is an advice filing to propose necessary revisions to the CSI Program Handbook.

We agree with the Commission’s assessment that presently “[i]t is not clear whether CSI incentives can be applied to a generator sized to offset the entire aggregated load or whether the CSI incentive is limited to covering the portion of the generator that offsets the load [of] the Generating Account.”¹ We understand and agree that any changes to the CSI Program Handbook and the CSI Program are outside the scope of this advice filing. Nevertheless, we agree with the Commission that this issue should be addressed.

Consistent with the procedures established by Commission Decision (D.)06-08-028, revisions to the CSI Program Handbook are proposed via an advice filing filed by one or more of the CSI Program Administrators. Therefore, while CCSE is pleased to see that the Commission has indicated in the Draft Resolution that this issue has been referred to the CSI Program Administrators and the Energy Division to address, CCSE urges the

¹ Draft Resolution E-4665, page 30.

Commission to explicitly state within the Resolution that the appropriate vehicle for addressing this issue is an advice filing to propose the necessary revisions to the CSI Program Handbook.

CONCLUSION

CCSE appreciates the opportunity to provide these comments on the Draft Resolution and urges the Commission to make the changes requested herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sachu Constantine". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Sachu Constantine
Director of Policy
California Center for Sustainable Energy

cc: Commission President Michael R. Peevey, *via email to mp1@cpuc.ca.gov*
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