



CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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Sent via E-Mail

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June 30, 2014

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

RE: Reply Comments of California Farm Bureau Federation on Draft Resolution E-4665/ID #13049

Dear Energy Division Tariff Unit:

The California Farm Bureau Federation (“Farm Bureau”)¹ continues to support Draft Resolution E-4665, which approves modifications to the San Diego Gas and Electric Company and Southern California Edison Net Energy Metering (NEM) Tariffs to enable multiple meter aggregation pursuant to Senate Bill 594 (Wolk, 2012) and Resolution E-4610. Farm Bureau endorses changes to the Resolution recommended by Edison and AECA. As reflected in the opening comments, there is broad support for the approval of Draft Resolution E-4665 by the Commission at the earliest opportunity.

Edison proposes to include a clause in Special Condition 6 of Schedule NEM to help ensure that customers are aware that the billing services fees are technically interim established fees and may be subject to change on a going forward basis. Farm Bureau does not object to the inclusion of such a provision. In addition AECA raises a valid concern over the ability to collect sufficient data necessary to properly analyze the appropriateness of changing the billing services fees. Farm Bureau supports their recommendation to modify Draft Resolution E-4655 to allow at least two years to determine if the initial billing services fees are recovering utility costs and whether a change to the fees is needed.

Aggregation for net metering purposes in particular addresses the unique constraints of agricultural businesses, delivering a pragmatic solution to otherwise insurmountable limitations to utilizing renewable energy on-site. Farm Bureau

¹ The California Farm Bureau Federation is California’s largest farm organization with approximately 78,000 agricultural and associate members in 53 county Farm Bureaus. California farmers and ranchers sell \$44.7 billion in agricultural products annually, accounting for hundreds of thousands of jobs in California. Farm Bureau’s members expect to pay in excess of \$850 million for their electric service.

NANCY N. McDONOUGH, GENERAL COUNSEL

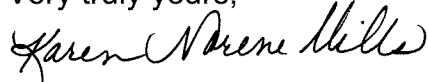
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appreciates the Commission's and other parties' efforts in moving forward expeditiously with the program and urges adoption of Draft Resolution E-4665.

Very truly yours,



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KNM/pkh

cc: Director, Energy Division (via e-mail)
Gabe Petlin (via e-mail)
Rulemaking 12-11-005 Service List (via e-mail)
Rulemaking 10-05-004 Service List (via e-mail)
Commissioners: Carla J. Peterman, Catherine Sandoval, Michael Picker,
Michael R. Peevey, Mike Florio
Chief Administrative Law Judge
CPUC General Counsel