

June 30, 2014

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

Re: Reply Comments of the Solar Energy Industries Association on Draft Resolution E-4665

Dear Mr. Randolph:

By way of this letter, the Solar Energy Industries Association (SEIA)¹ replies to certain of the comments submitted June 23, 2014, on the above-referenced Draft Resolution which approves 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.

California Solar Initiative (CSI) Application Treatment

The Draft Resolution refers the issue of the treatment of prospective NEM aggregation customers that receive a CSI incentive reservation for more than one renewable electrical generating facility on a single property to the Energy Division and Program Administrators (PAs) of the CSI to address. In its Opening Comments, SEIA recognized the need to address this issue through an amendment to the CSI Handbook, but it requested that the issue be resolved 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. Similarly, the California Center for Sustainable Energy (CCSE), CSI program administrator in SDG&E's service territory, recognized the need to effect changes to the CSI Handbook in order to address this issue, and, consistent with the procedures established by Commission Decision 06-08-028 for revisions to the CSI Program Handbook, requested that the Resolution be revised to "explicitly state" that "the appropriate vehicle for addressing this issue is an advice filing to propose the necessary revisions to the CSI Program Handbook."² SEIA supports CCSE's request as it will achieve the most expeditious resolution of this issue in a manner consistent with previous established Commission procedures.

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

² Comments of California Center for Sustainable Energy on Draft Resolution E-4665, June 23, 2014, p. 3.

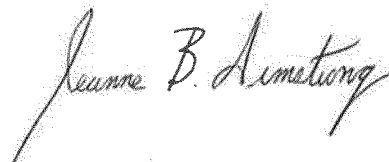
Modification of Billing Service Fees

The Draft Resolution would have SCE and SDG&E file advice letters one year from the effective date of their respective NEM aggregation tariffs, proposing modifications to the billing service fees on a going forward basis. In Opening Comments, the Agricultural Energy Consumers Association (AECA) expressed concerns that one year may not be sufficient time to collect the data necessary to support a fee change and, accordingly, requested that the Draft Resolution be modified to allow at least two years to determine if the billing service fees established by the resolution are recovering the costs of utility billing services.³ SEIA supports AECA's request. At this time, it is impossible to predict how quickly eligible customers will take advantage of NEM Aggregation. Thus, a one year period of time might not provide sufficient data upon which to base proposed changes to the service fees (e.g., slow subscription in the initial year may result in the IOUs proposing increased service fees which ultimately become unnecessary as subscriptions increase).

Thank you for your consideration of these comments.

Very truly yours,

GOODIN, MACBRIDE, SQUERI,
DAY & LAMPREY, LLP



Jeanne B. Armstrong

Counsel for the Solar Energy
Industries Association

cc: Commissioner Michael Peevey, President (mp1@cpuc.ca.gov)
Commissioner Michel Florio (mfl@cpuc.ca.gov)
Commissioner Katherine Sandoval (cjs@cpuc.ca.gov)

³ Agricultural Consumers Energy Association Comments on Draft Resolution E-4655, June 23, 2014, p. 2.

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