



CALIFORNIA FARM BUREAU FEDERATION

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June 23, 2014

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

**RE: 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 supports 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. The approval of Draft Resolution E-4665 by the Commission at the earliest opportunity is urged.

Farm Bureau appreciates the efforts undertaken by the Commission and the staff to find a common approach for implementation of SB 594 and Resolution E-5610. Draft Resolution E-4665 reflects thoughtful, thorough and effective consideration of the issues which have arisen over the course of the process for implementation of the multiple meter aggregation tariffs. Farm Bureau members throughout the state have consistently voiced strong interest in meter aggregation opportunities, which interest by Edison and SDG&E customers has been heightened by the approved program for PG&E. In the current climate for agricultural customers, every opportunity to utilize resources for effective management of input costs is seriously considered.

Although the supplemental advice letters submitted by SDG&E and Edison resolved many of the issues that were raised by the parties, the billing services charges issue was one that remained outstanding. (Issue 3, pages 19-26 of Draft Resolution E-4655). As in the case of PG&E's program, this Draft Resolution resolves the challenge

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

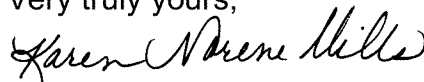
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of finding a fair balance that allows the SDG&E and Edison programs to move forward, while at the same time assessing fair service fees. Importantly Draft Resolution E-4665 requires the filing of a Tier 3 Advice Letter if any modifications to the service fees are later proposed and requires the inclusion of detailed justification for any modifications. As with PG&E's tariff requirements such changes can come about only after the costs are tracked for a year. It is essential for customers' understanding of this program that there be consistency among the utilities on important elements such as the approach used for billing services charges.

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 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