

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code Section
2827.1, and to Address Other Issues Related to
Net Energy Metering.

Rulemaking 14-07-002
(Filed July 10, 2014)

**THE OFFICE OF RATEPAYER ADVOCATES' REPLY COMMENTS
ON THE ORDER INSTITUTING RULEMAKING TO DEVELOP A
SUCCESSOR TO EXISTING NET ENERGY METERING TARIFFS
PURSUANT TO PUBLIC UTILITIES CODE SECTION 2827.1,
AND TO ADDRESS OTHER ISSUES RELATED
TO NET ENERGY METERING**

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I. INTRODUCTION

Pursuant to the July 17, 2014 “Order Instituting Rulemaking to Develop a Successor to Existing Net Energy Metering Tariffs Pursuant to Public Utilities Code Section 2827.1, and to Address Other Issues Related to Net Energy Metering” (OIR), the Office of Ratepayer Advocates (ORA) submits these reply comments. Thirteen parties filed opening comments: Community Alliance with Family Farms (CAFF), Californians for Renewable Energy (CARE), Clean Coalition, California Energy Storage Alliance (CESA), California Farm Bureau Federation, Interstate Renewable Energy Council, Local Government Sustainable Energy Coalition, Marin Clean Energy (MCE), Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), The Alliance for Solar Choice, and The Utility Reform Network (TURN).

II. DISCUSSION

A. The scope of the OIR is adequate.

ORA concurs generally with Interstate Renewable Energy Council, TURN, the Alliance for Solar Choice, and SCE, that the scope outlined in the OIR is adequate.

B. The Commission should schedule a hearing

ORA agrees with PG&E, TURN and SCE, that a hearing should be scheduled, which can be cancelled if it is not required. The OIR states that a hearing will not be necessary; however, factual issues may arise that will require testimony and hearings. The hearing should be scheduled for a time after the public tool is released and parties have had the chance to use the tool and run scenarios for the successor tariff. Based on the schedule for the OIR, ORA recommends that a hearing be scheduled for the summer of 2015. ORA respectfully requests that the Commission reconsider this determination and provide that hearings may be required.

C. Sufficient time should be afforded for vetting the public tool methods, assumptions, and results

ORA shares TURN’s concern that the current OIR schedule does not identify when and if parties will be given an opportunity to sufficiently vet the methods, assumptions, and results of the Public Tool. The Public Tool will undoubtedly generate results of some sort. But whether the Public Tool results are valid is a more important concern. Model validation is an essential part of the model development process if the Public Tool is to gain acceptance and be used to support Commission decision making. It is important that the Public Tool is programmed

correctly and error-free. But more importantly, the Commission must be assured that the Public Tool provides accurate information about the system being modeled. One way to validate the Public Tool is to model historical scenarios, for example, rate structures and cost inputs associated with a previous year(s) (e.g., 2010-2014) and determine if the results accurately reflect the conditions in these historical years. ORA agrees with TURN that sufficient time be allotted for vetting and that the development of the Public Tool be an iterative process.

III. CONCLUSION

ORA supports the scope of the OIR, requests the Commission to schedule a hearing for a time after the public tool is released and parties have had the chance to use the tool and run scenarios for the successor tariff, and requests sufficient vetting of the Public Tool methods, assumptions, and results. ORA also looks forward to participating in this proceeding.

Respectfully submitted,

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