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Sent: Friday, July 13, 2012 4:32 PM
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Cc: Blattner, William
Subject: SB 843 vs Share the Sun

FILED
07-18-12
04:59 PM

Here is a comparison table. I hope this is helpful,

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Comparison Table – SDG&E “Share the Sun” and SB843

| | Share the Sun | SB843 As In Print 7/13/12 |
|---|---|---|
| Program limit | Total pilot program is 10 MW | 2 GW statewide, with discretion to Commission to remove cap. (We have heard conflicting stories on whether this limit was reduced, possible to 250 MW statewide.) |
| Size of facility | Determined by owner and location limitations and costs, however limited to 1MW build-outs until fully subscribed by customers. | Up to 20 MW |
| Limits on customer participation | Must have an SDG&E account. Customer subscriptions limited to 200% of customer annual energy use and by requirements of seller. Facility must be within SDG&E service territory. | May not buy more than 2 MW, except, no limit for government, schools, and colleges. Must be located in service area of facility or, under some conditions, in contiguous service area. |
| How is facility location selected | Proposed by solar provider, located within SDG&E service territory. By ensuring that costs of service are passed on to owner, there is an incentive to optimize location and minimize cost | Chosen by developer. Facility may be located in contiguous service territory if the utilities have an agreement enabling the connection of the benefiting account to the community renewable energy facility.. |
| Customer compensation | Bilateral transaction between owner and customer to establish customer cost of subscription. Customer provided bill credit for level of subscription, based on FiT rate set by SB32 with adjustments to maintain ratepayer indifference. Designed to result in no incremental cost to non-participants. | Bilateral transaction between owner and customer to establish customer cost of subscription. Bill credit based on past RPS contract prices with the potential for price increases for participating customers if the commission determines that the facility provides net added value that exceeds the value of the credit. Intended to provide an incentive that is passed on to non-participants. |
| Transparency and nonbypassability of incentive | No incremental cost to nonparticipants. | Incremental cost to nonparticipants not specifically identified and no provision to ensure nonbypassability of the cost of the incentive. Language drawn from NEM section could prevent including a ratepayer indifference component. |
| Duration of utility obligations | SDG&E subscription limited to 5, 10, 15 years . | No end date specified. |
| Subject to DA Rules? | Not Applicable. Customer remains bundled and responsible for all bundled ratepayer costs through rate design of program. | Although not explicit, it appears the bill envisions continued bundled utility service. |
| Unsubscribed output | Purchased at FiT rate. | Purchased at DLAP rate. |
| Count toward utility RPS? | Subscribed amounts – No Unsubscribed amounts - yes | Subscribed amounts – No Unsubscribed amounts - yes |