Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision D.16-01-044, and to Address Other Issues Related to Net Energy Metering.

Rulemaking 20-08-020

COMMENTS OF THE CALIFORNIA FARM BUREAU FEDERATION ON PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE HYMES ON REVISING NET ENERGY METERING TARIFF AND SUBTARIFFS

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision D.16-01-044, and to Address Other Issues Related to Net Energy Metering.

Rulemaking 20-08-020

COMMENTS OF THE CALIFORNIA FARM BUREAU FEDERATION ON PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE HYMES ON DECISION REVISNG NET ENERGY METERING TARIFF AND SUBTARIFFS

I. INTRODUCTION

Pursuant to Rule 14.3 of The Commission’s Rules of Practice, the California Farm Bureau Federation (Farm Bureau)\(^1\) submits these Comments on the Proposed Decision of Administrative Law Judge Hymes (PD) on Decision Revising Net Energy Metering Tariff and Subtariiffs dated December 13, 2021. It proposes a successor net energy metering tariff that addresses the guiding principles adopted in Decision 21-02-011 as well as the related statutory requirements and revisions to the current net energy metering tariff. Farm Bureau along with the Agricultural Energy Consumers Association, jointly the Agricultural Parties, submitted testimony and briefs in the proceeding that focused solely on nonresidential customers and the lack of evidence to support making changes to

\(^1\) The California Farm Bureau Federation is California’s largest farm organization, working to protect family farms and ranches on behalf of its nearly 32,000 members statewide and as part of a nationwide network of more than 5.5 million members. Organized 100 years ago as a voluntary, non-governmental and nonpartisan organization, it advances its mission throughout the state together with its 53 county Farm Bureaus.
current nonresidential NEM 1.0 and 2.0 customers and for that same reason, to leave nonresidential customers on NEM 3.0 largely unchanged. While Farm Bureau shares the belief of many in this proceeding that the PD will stifle future adoption of self-generating renewable resources under NEM 3.0, Farm Bureau is particularly disheartened by the failure to distinguish nonresidential customers in making recommendations and potentially undercutting nonresidential NEM 1.0 and 2.0 customers without proper support to do so.

As more specifically explained below, the PD focuses extensively, if not exclusively, on residential customers. This singular focus is supported by evidence that the current framework for residential customers is not cost effective. However, nonresidential customers on net metering tariffs do pay rates that more than adequately cover their cost of service. Failure to distinguish nonresidential customers and potentially undercutting current nonresidential NEM 1.0 and 2.0 customers undermines the investment many have made in advancing the Commission’s goals of increasing self-generation and erodes any confidence in the future that the Commission’s regulations will remain consistent.

In addition, to advance many of the Commission’s stated goals, the Commission focus should be on acquiring State funding for programs rather than further expanding the litany of charges ratepayers are responsible for.

II. NEM 1.0/2.0 SHOULD REMAIN UNCHANGED FOR NONRESIDENTIAL CUSTOMERS

Farm Bureau first contends that the PD does not intend to change the payback period for nonresidential NEM 1.0 and 2.0 customers, but through harmless error simply failed to clarify this point. The PD addresses “all existing residential non-
CARE NEM 1.0 and NEM 2.0 tariff customers”\(^2\) and “remaining residential NEM 1.0 and 2.0 customers”\(^3\) while providing its justification for modifying \textit{residential} NEM customer payback periods. The PD notes the longer payback periods associated with nonresidential customers but does not go on to further address the period that nonresidential customers may remain on the existing tariffs. This seemingly indicates the payback period would \textit{not} change for current nonresidential customers. Yet when the PD begins its discussion of future NEM 2.0 customers, the PD states “[f]or the same reasons that we require existing NEM 1.0 and NEM 2.0 tariff customers to transition to the successor tariff at 15 years....”\(^4\) Farm Bureau believes this is harmless error and the PD intended to state “existing \textit{residential} NEM 1.0 and NEM 2.0 tariff customers” based on the justification the PD has provided. The PD seemingly splits the difference between the average payback periods for \textit{residential} NEM customers (the highest average being 10.8)\(^5\) and the current payback period of 20-years. To do the same for \textit{nonresidential} customers who average a 13-year payback period and the highest value in each sector (16.5, 15.8, and 18.3) are all greater than the proposed 15-year payback period would defy the notions of fairness and equity the PD proposes for making changes to \textit{residential} customers. For that reason, Farm Bureau believes there was simply a lack of clarity and has made suggested changes in its Appendix.

\(^2\) PD at 149.
\(^3\) \textit{Id.}
\(^4\) PD at 151.
\(^5\) Lookback Study at Table 5-5.
For sake of argument, if the PD truly intended to include all existing NEM 1.0 and 2.0 customers, Farm Bureau believes the decision to change the payback period for nonresidential NEM 1.0 and 2.0 customers, which translates into the duration that customers may remain on existing tariffs, is unsupported by the record. As discussed above, the PD’s rationale for modifying the payback period for residential customers is not justified for nonresidential customers. Second, the guiding principles of Assembly Bill (AB) 327 (Perea, Stats. 2013, ch. 611) and Decision (D.) 16-01-044 should lock in the 20-year payback period. Third, changing the agreed upon payback period now will have a chilling effect on any future investment under the successor tariff, because customers will be unable to rely on the parameters of the new tariff.

Decision 16-01-044 summarizes the prior NEM transition period and the justification for locking in a payback period.

The Commission recently decided, in D.14-03-041 (implementing the requirements of Section 2827.1(b)(6)), that 20 years from the customer’s interconnection under the existing NEM tariff was a reasonable period over which a customer taking service under the existing NEM tariff should be eligible to continue taking service under that tariff. This decision should be applied to customers under the NEM successor tariff as well, to allow customers to have a uniform and reliable expectation of stability of the NEM structure under which they decided to invest in their customer-sited renewable DG systems.6

The PD cites the same source in its discussion of potential revisions to the NEM 1.0 and 2.0 tariffs, but then seemingly disregards the intent behind previous

6 D.16-01-044 at 100.
Commission’s statements. The PD appears to justify its decision to modify the payback period for current NEM 1.0 and 2.0 customers on the notion that the Commission now has the necessary data to make an *informed* decision that was previously lacking. What the PD fails to acknowledge is that the customers, and in particular nonresidential customers, who were deciding to make an investment under NEM 1.0 and 2.0 were making a decision based on the data that was available to them at the time as well. To now change the underpinnings of that decision based on new information does not consider the investment a customer has already made. That customer cannot now decide the investment does not make sense under a 15-year payback period and simply return their self-generation equipment for a refund. The customer either fulfilled or is fulfilling their contractual obligations for the purchase of their equipment. For the Commission to not fulfill their end of the bargain goes against all notions of good faith and fair dealing. Farm Bureau recognizes the Commission has the authority to revise prior decisions but contends in this circumstance restraint should be exercised to fulfill commitments made in the previous decision.

Ultimately, Farm Bureau is hopeful the failure to clarify the changes to the program do not apply to nonresidential customers was simply an oversight. The PD’s justifications for changes to residential customers does not apply to nonresidential customers. If the Commission intends to make changes for

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7 PD at 146.  
8 PD at 144.
nonresidential customers, Farm Bureau recommends the Commission reconsider its stance on their decision to override its promise “to allow customers to have a uniform and reliable expectation of stability of the NEM structure under which they decided to invest”\(^9\) and the ramifications that come from disregarding that commitment.

III. ERRORS IN ASSESSING NONRESIDENTIAL COST EFFECTIVENESS

The PD makes several leaps of logic or incorrect statements that do not accurately reflect how nonresidential customers participate in the NEM 2.0 tariff or how the results of the Lookback Study reflect the cost effectiveness of nonresidential customers. One of the first errors concerns the PD’s description of NEM 2.0 customers on page 5. NEMA customers are not allowed the surplus compensation element and do not receive full retail credit.\(^{10}\) This is just one example of the generalized language of all customers or specifying residential customers when addressing impacts, then failing to clarify or separate out nonresidential customers.

Another false premise presented is that the Commission cannot retain the NEM 2.0 structure for nonresidential customers because demand charges and high fixed charges may disappear.\(^{11}\) The PD states and makes a Findings of Fact as follows: “if we determined the NEM 2.0 structure compliant with our guiding principles, a change in demand charges or fixed charges in another proceeding

\(^9\) PD at 146.
\(^{10}\) PG&E Electric Schedule NEM2, Special Condition 6; SCE Schedule NEM-ST, Special Condition 5; and SDG&E Schedule NEM-ST, Special Condition 7.
\(^{11}\) PD at 94.
could lead to furthering a cost shift in net energy metering that could be challenging
to unwind.” 12 This reasoning for not finding the NEM 2.0 structure compliant with
guiding principles for the nonresidential customer sector ignores the fact that the
Commission oversees cases that implement demand charges and fixed charges.
Further, there has been zero indication from the utilities that they are willing to
remove demand charges and the list of fixed charges seems to grow daily. If the
charges somehow disappeared, demand charges could remain for the net
metering tariff in each utility or as the PD reminds parties, the Commission can
choose to modify any decision that would impact the parameters of the net
metering tariff.

Farm Bureau is aware the proceeding focused primarily on residential
customers because, as the PD identified, the Lookback Study indicated the NEM
2.0 tariff disproportionately benefits non-CARE residential NEM 2.0 tariff
customers while all other customers, including those with lower incomes, bear the
addition of 82 to 91 percent of the cost of service bypassed by these tariff
customers. 13 A clear reading of that determination is the conclusion that
nonresidential customers are included in those bearing 82 to 91 percent of the cost
of service bypassed by non-CARE residential customers. This is evident when
looking at Table 2 regarding the ratio of bill payment to cost of service. 14
Nonresidential customers have never paid less than their cost of service either

12 PD at 164.
13 PD at 47.
14 PD at 12.
Pre-NEM or Post NEM. In fact, the lowest percentage is 105 under NEM 1.0. In 2019, nonresidential customers paid $117.5 million more than the cost to serve them while residential NEM 2.0 customers paid $618.6 million less than the cost to serve them. Yet, the PD determined NEM 2.0 is not cost-effective for nonresidential customers. The evidence certainly does not definitively deem nonresidential customers are shifting costs to other customers as the PD asserts.

The E3 White Paper uses the word “nonresidential” once, in a footnote. Its focus is solely on residential impacts and cannot be relied on to prove or disprove nonresidential cost effectiveness. Review of the ‘Proposals for Net Energy Metering Tariff Changes’ section in the PD further confirms both the residential focus of the proceeding and the lack of analysis or record to support changes to nonresidential customers. CALSSA proposed what the Agricultural Parties supported in their reply brief, to not make any changes to nonresidential customer tariffs. Parties had the benefit of reviewing the Lookback Study prior to submitting proposals and understood the problem was not nonresidential customers. The Joint Utilities did make proposals impacting nonresidential customers regarding combining VNEM/NEMA and monthly true-ups (which were rejected as part of this PD).

15 PD at 13.
16 Lookback Study at 96.
17 White Paper at 13, footnote 17.
18 PD at 16-32.
consistently noted how nonresidential customers represent a more cost-effective structure when considering NEM participating customer benefits and the costs of NEM benefits borne by nonparticipating customers.\textsuperscript{21}

The PD acknowledges that no party disputed the PCT, RIM, and TRC cost-effectiveness results for the commercial, agricultural, and industrial sectors and found it reasonable to affirm the cost-effectiveness results for the commercial, agricultural, and industrial sectors.\textsuperscript{22} The PD goes on to state they should consider \textit{all} three Standard Practice Manual tests when determining cost-effectiveness of a resource.\textsuperscript{23} The PD then makes the logical leap that nonresidential sectors are not cost-effective based solely on the RIM test.\textsuperscript{24} Farm Bureau does not argue that the RIM test should not be considered, but it should also not be the trump card. The PD's own directive is to take a holistic look.\textsuperscript{25} Yet, despite the PCT and TRC tests showing that nonresidential tariffs are cost-effective and the real world evidence of nonresidential NEM 2.0 customers overpaying their cost of service, the PD still concludes nonresidential tariffs are not cost-effective. In fact, the PD makes a finding that \textit{all} customers are forced to bear the 82 to 91 percent non-CARE residential customers shortfall.\textsuperscript{26} Based on this logic, nonresidential customers not only pay a portion of the residential shortfall and 100 percent of their own cost of service, but also contribute 8 percent, 52 percent, and 66 percent more to the cost

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{21} Id.
\item \textsuperscript{22} PD at 43.
\item \textsuperscript{23} Id.
\item \textsuperscript{24} Id.
\item \textsuperscript{25} PD at 56.
\item \textsuperscript{26} PD at 157.
\end{itemize}
\end{footnotesize}
for all customers in their respective service territories.\textsuperscript{27} To conclude nonresidential customers are not cost-effective is simply unsupported by the record of this proceeding and deserving of a more nuanced analysis.

IV. NEWLY CREATED COMMISSION PROGRAMS SHOULD BE FUNDED WITH GENERAL FUND DOLLARS RATHER THAN CREATING ADDITIONAL BURDENS FOR RATEPAYERS AND POTENTIALLY CREATING A GREATER COST SHIFT

The PD proposes credits and funds to transition to the successor tariff. However, the PD is either unclear about the funding source or places the burden on ratepayers. Farm Bureau believes the Commission should be seeking State funding to support State initiatives rather than risking an additional cost shift. The Commission acknowledges it has the responsibility not to burden nonparticipant ratepayers\textsuperscript{28}, but the PD and the record provide insufficient data regarding the impacts these additional ratepayer costs to support these programs will have on rates and nonparticipants.

As discussed above, the PD tosses aside the cost effectiveness of nonresidential customers by theorizing demand charges and high fixed charges could somehow vanish in a future proceeding.\textsuperscript{29} The PD, however, does acknowledge the payment of these high fixed and demand charges should be considered when assessing the Grid Participation Charge and ultimately determines the nonresidential customers already contribute to the grid support

\textsuperscript{27} PD at 12, citing the Lookback Study at Table 1-7.

\textsuperscript{28} PD at 49.

\textsuperscript{29} PD at 94.
costs beyond their energy charges. The PD does not explain the contradiction that prohibits nonresidential customers from receiving the Market Transition Credit (MTC) yet being charged for the cost of the fund. Farm Bureau is not advocating for implementation of a MTC, however creating additional charges without access to the benefits creates a new cost shift among ratepayers. As stated above, the E3 White Paper which uses the word “nonresidential” once, purportedly provides the basis for the MTC. TURN and NRDC put forth residential focused proposals regarding the MTC. Based on those proposals, the PD created an MTC paid for by all ratepayers, but inaccessible to nonresidential customers. The record does not support this decision and the PD does not provide sufficient evidence there will not be a future cost shift. Farm Bureau contends that the Commission should be seeking the use of general fund dollars for the program or as NRDC suggested cap-and-trade revenue to support the State’s renewable energy goals rather than relying on ratepayer contributions.

Similarly, the Storage Evolution Fund relies on ratepayers to fund the Commission’s goal to promote storage. To claim this along with the other charges above will not shift costs to nonparticipants would be disingenuous. Additionally, the Commission’s Equity Fund is vague in its source of funding. The

30 PD at 123.
31 PD at 121-122.
32 PD at 102.
34 PD at 105.
35 NRDC Proposal at 3.
36 PD at 150.
PD states the funding will come from cost shift savings generated through reform of the successor tariff.\textsuperscript{37} Because it does not explain how the savings are captured and which ratepayers provide the savings, the only conclusion that can be drawn is that the proposal is simply another cost shift from one ratepayer category to another. The record does not support who will bear the brunt of this shift, proposing additional ratepayer funding only seems to create a host of new inequities to address. The Commission should strongly consider revising its proposals to initially seek State support to implement statewide goals rather than saddling ratepayers with additional charges and creating additional problems to address in future proceedings. Not only do the additional fees raise inequities amongst customers, but there is a real concern that the costs related to them will continue to increase. The Commission should focus on the parameters of the successor tariff and assess its effectiveness before creating new costs.

V. REVISIONS TO NEMA IGNORE LEGISLATIVE INTENT AND ARE UNSUPPORTED BY THE RECORD IN THIS PROCEEDING

The PD proposes to adopt the same structure for future Net Energy Metering Aggregation (NEMA) customers as for future NEM 3.0 customers.\textsuperscript{38} As Farm Bureau explains below, the NEMA subtariff requires a more nuanced approach. The Agricultural Parties’ testimony, opening brief and reply brief explained the flaws in the Joint IOUs statements regarding NEMA. The clear record that NEMA customers pay their share of distribution and transmission costs

\textsuperscript{37} PD at 138.
\textsuperscript{38} PD at 139.
with no evidence to the contrary, should direct the current NEMA subtariff to remain intact as is. The PD simply asserts the NEMA subtariff will be revised without sufficient reference to any authority.\textsuperscript{39} Farm Bureau emphasizes the same arguments from above as to why NEMA is cost effective and the lack of record or citation to a record showing otherwise.

As the Agricultural Parties discussed in their reply brief, which bears repeating in these comments since it was not discussed in the PD, the NEMA subtariff is not the standard NEM tariff. It is an aggregation option, available to customers with multiple meters, and was subjected to the Commission finding that aggregation would not result in a cost shift to non-participating ratepayers.\textsuperscript{40} In fact, the Commission referred to the NEMA tariff as a “sub-schedule of” and a “supplement under” the NEM successor tariff.\textsuperscript{41} The IOUs implemented NEMA as a special condition in their NEM tariffs.\textsuperscript{42} Importantly, the Commission did not deviate from the Section 2827(h) credit and debit provisions, crediting methodology or annual true-up requirement for NEMA customers when it implemented NEM 2.0 pursuant to Section 2827.1.\textsuperscript{43} Section 2827.1 does not purport to supplant non-standard arrangements like NEMA and the Joint IOUs’ unsupported argument to the contrary should be rejected.

\textsuperscript{39} PD at 141.
\textsuperscript{40} Cal. Pub. Util. Code § 2827(h)(4)(A) and (D). The Commission made the required finding in Resolution E-4610.
\textsuperscript{41} D.16-01-044, pp. 4 and 98.
\textsuperscript{42} PG&E Electric Schedule NEM2, Special Condition 6; SCE Schedule NEM-ST, Special Condition 5; and SDG&E Schedule NEM-ST, Special Condition 7.
\textsuperscript{43} D.16-01-044, pp. 99-100.
Moreover, if the Legislature had indeed intended to merge NEMA with the standard NEM contracts and tariffs, it could have done so when it enacted AB 327, which added Section 2827.1. It makes sense that the Legislature did not seek to do so. SB 594, the legislation that authorized NEMA, was enacted in 2012, just a year before AB 327 was enacted. It would have been inefficient, illogical, and disruptive to customers and the market to effectively undo the aggregation authorized by SB 594 even before it was implemented. The Legislature could have easily included a provision in Section 2827.1 to designate that Section 2827 would be overridden either at that time or under specific conditions in the future—yet it did not do so, showing a lack of legislative intent to act in the way that the Joint IOUs proposed. The Commission’s implementation of NEMA is consistent with this analysis. The Commission maintained the Section 2827(h) credit and debit provisions, crediting methodology and annual true-up provisions in its 2016 decision continuing NEMA (D.16-01-044). Additionally, the Commission previously authorized continuation of those provisions when it approved the initial tariffs implementing NEMA in 2014, after enactment of AB 327.\textsuperscript{44} The Joint IOUs’ proposal does not make sense when considered in the context of the Legislative history.

The failure to address this issue thoroughly in the PD is disappointing. Even though the Commission is choosing not to directly apply Section 2827(h), it has

\textsuperscript{44} Resolutions E-4610 and E-4665.
the discretion – as recognized by the Joint IOUs\textsuperscript{45} – to maintain the Section 2827(h) credit and debit provisions, crediting methodology and annual true-up in a successor NEMA program. The record in this proceeding supports maintaining those elements of the NEMA program, and Farm Bureau respectfully requests the Commission require that a successor NEMA program continue to include the credit and debit provisions, crediting methodology and annual true-up provided for in Section 2827(h).\textsuperscript{46}

VI. CONCLUSION

Farm Bureau recognizes and appreciates the extensive record in this proceeding, as well as the need to carefully scrutinize the various proposals that were submitted for consideration. However, it is clear that because there has been so much emphasis on the residential side of the equation in assessing the costs and benefits of the net metering tariff that the nonresidential tariffs and subtariffs have not received fair consideration of their contributions to costs. The Commission should consider a second track of this proceeding to properly evaluate nonresidential impacts rather than misapply residential impacts and principles to nonresidential customers. Farm Bureau requests that the changes made to the Findings of Fact, Conclusions of Law, and Order listed in the attached appendix be included in the final decision. Essentially, the relief we request is to retain the current NEM 1.0 and 2.0 parameters for the duration of the 20 years

\textsuperscript{45} Joint IOUs’ Reply Brief, p. 117
\textsuperscript{46} See Exh. AEC-01, Exh. AEC-02 and Opening Brief of the Agricultural Parties.
committed to by the Commission. Furthermore, the NEMA construct should remain as is moving forward.

Dated: January 7, 2022

Respectfully submitted,

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APPENDIX OF PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, 
AND ORDERING PARAGRAPHS REVISIONS

Proposed Revisions to Findings of Fact:

7. **Residential** NEM 2.0 tariff customers bypass infrastructure and other service costs embedded in volumetric rates by decreasing grid imports.

8. The bypassed infrastructure and other service costs embedded in volumetric rates by residential NEM 2.0 participants over the course of the 20-year legacy period are shifted to non-participant ratepayers.

9. The Lookback Study indicates residential NEM 2.0 customers negatively impact non-participant ratepayers.

10. The precise financial impact of residential NEM 2.0 customers on nonparticipant ratepayers depends on the Avoided Cost Calculator values used.

18. The Lookback Study indicates the nonresidential sectors of the NEM 2.0 tariff are not cost-effective.

46. Payback periods are not the predominant factor for customers when considering solar adoption.

56. The magnitude and severity of residential NEM 2.0 customers cost shift requires immediate action by the Commission.

80. Basing export rates on retail rates has resulted in compensation levels for residential customers 3.8 to 5.4 times higher than the benefits they provide to the electrical systems in the form of avoided costs.

104. The current design of retail rates no longer provides the ability to accurately calculate a residential customer’s energy and grid usage, with respect to net energy metering customers.

186. VNEM and NEMA serve separate purposes and generally have separate customer bases: VNEM for multi-family customers and NEMA for agricultural customers (but not exclusively).

208. The record supports leaving nonresidential NEM 1.0 and NEM 2.0 tariff legacy periods at 20-years to ensure these customers have reasonable payback of their investment.
Proposed Revisions to Conclusion of Law:

2. The Commission should affirm the residential NEM 2.0 tariff negatively impacts non-participant ratepayers.

4. The Commission should affirm the NEM 2.0 tariff is not cost effective for the commercial, industrial, and agricultural customer segments.

55. The Commission should not revise the legacy period for nonresidential NEM 2.0 customers keeping intact the 20-year payback period after the date of interconnection.

Proposed Revisions to Ordering Paragraphs:

1. The following findings from the Lookback Study are affirmed:
   (a) the NEM 2.0 tariff negatively impacts non-participant ratepayers;
   (b) the NEM 2.0 tariff is not cost-effective for the commercial, industrial, and agricultural customer segments;

12. The original Net Energy Metering tariff, referred to as NEM 1.0, and its successor, referred to as NEM 2.0, are revised as follows:
   (d) The changes to legacy period do not apply to nonresidential NEM 1.0 or 2.0 customers who will remain at a 20-year legacy period.

13. No later than five business days after the adoption of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company (Joint Utilities) shall submit Tier 1 Advice Letters revising the legacy period for residential non-California Alternate Rates for Energy (CARE) customers on the current net energy metering tariff (NEM 2.0) and the previous net energy metering tariff (NEM 1.0) from 20 years to 15 years, with an effective date of five days after the advice letter submittal date. Nonresidential NEM 2.0 and NEM 1.0 customers shall remain at 20-years. Joint Utilities shall inform solar providers of the change on the date that they submit these advice letters. Each of the Joint Utilities shall email and send an automated phone call to all solar providers who submitted an interconnection application in the three years preceding this date, and for whom the utilities have the requisite contact information. The Joint Utilities shall each mail a letter to all solar providers who submitted an interconnection application in the year preceding this date.
14. No later than 15 days from the adoption of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall notify residential customers of the original net energy metering tariff, NEM 1.0, and the current net energy metering tariff, NEM 2.0, of the changes in the tariff, as directed in Ordering Paragraph 12. There will be no changes for nonresidential customers.