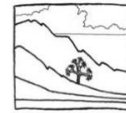




HAMMOND CLIMATE SOLUTIONS FOUNDATION
Dynamic Action for a Sustainable Planet



Basin and Range Watch



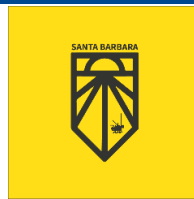
BREATHE SOUTHERN CALIFORNIA



California Alliance for Community Energy
www.cacommunityenergy.org



CALIFORNIANS FOR WESTERN WILDERNESS



Santa Barbara Standing Rock Coalition



CFROG

350 Conejo San Fernando Valley



CLIMATE EQUITY POLICY CENTER



CONSEJO DE FEDERACIONES MEXICANAS®



NORTH SANTA BARBARA COUNTY

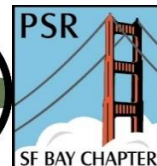
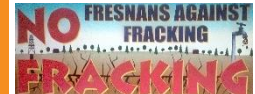


The Climate Reality Project®
ORANGE COUNTY, CA CHAPTER





CENTRAL CALIFORNIA ENVIRONMENTAL JUSTICE NETWORK







March 16, 2023
Alice Reynolds, President
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

To President Reynolds,

The undersigned 165 educational, public health, conservation, faith, energy, community, youth, environmental and climate justice organizations, collectively representing hundreds of thousands of Californians and a broad constituency of California ratepayers, request that the California Public Utilities Commission (CPUC) extend the effective date of implementing the net billing tariff that replaces NEM 2.0 until the CPUC resolves the issues in the [administrative appeal for re-hearing](#) filed by the Center for Biological Diversity, Protect Our Communities Foundation, and the Environmental Working Group.

The CPUC's decision to slash by 75%-80% the credit that new solar adopters receive for sharing their extra solar energy with their neighbors on the grid makes solar less affordable for millions of working people, businesses, churches, schools, farms, and community service institutions. At the same time, the climate emergency—and state law—requires that we get off fossil fuels and expand the use of local, clean and affordable energy generation.

Other states and localities that implemented similar changes saw solar adoptions drop by half or more. There is no reason to believe the outcome in California will be any different. As the appeal shows, **the CPUC's decision failed to meet the State's legislative mandate to keep rooftop solar growing, particularly in low-income communities of color** that face a disproportionate health impact from industrial pollution and weather-related consequences of climate change such as excessive heat and flooding. (AB 327 (2013), Public Utilities Code section 2827.1(b)).

The appeal also shows how **the CPUC's purported "cost shift" argument used to justify the slashing of credits would evaporate if the CPUC considered the true economic value and local benefits of rooftop solar.** Instead, the CPUC departed from its guidance and standard practice of considering *all* benefits of a proposed policy to include only a subset of the benefits of rooftop solar. The appeal details what environmental and social justice leaders have repeatedly pointed out--that the "cost shift" claim is a utility strategy to use false equity arguments as a weapon against advancing equity. The tools used by the CPUC to justify the purported "cost shift" are fundamentally flawed.

The CPUC decision is notably troublesome with respect to commercial and industrial distributed solar projects, which include businesses, farms, schools, churches, food banks, community health centers, and emergency service centers. As the appeal shows, the CPUC chose to slash the solar credit for these solar projects "without any record evidence." Given the critical role that these institutions play in working communities around the state, we expect such a drastic decision to have a thorough evidence-based rationale.

The climate emergency is unfolding all around us. State energy planners project that California must triple all forms of solar in order to meet its ambitious clean energy goals. Californians are being hammered with endless waves of double digit utility bill increases that can only be ameliorated with more local solar and battery storage. The appeal presents powerful and clear evidence that the CPUC's rooftop solar decision, and the modeling that drove the decision, runs counter to state law and PUC code and practice. For the sake of working communities and California's clean energy goals, we urge the CPUC to carefully re-hear the issues raised in the appeal before implementing drastic changes that undermine California's rooftop solar program.

Signed,

350 Butte County	Clean Coalition
350 Conejo / San Fernando Valley	CleanEarth4Kids.org
350 Santa Barbara	Climate Action Campaign
350 South Bay Los Angeles	Climate Action Mendocino
350 Ventura County Climate Hub	Climate Equity Policy Center
Action for the Climate Emergency	Climate First: Replacing Oil & Gas
Active San Gabriel Valley	(CFROG)
AjO	Climate Hawks Vote
Alliance of Nurses for Healthy	Climate Reality Project Orange County
Environments	Chapter
Ban Single Use Plastics	Coalition for Environmental Equity and
Basin and Range Watch	Economics
Bay Area Clean Air Coalition	COFEM-Consejo de Federaciones
Bay Area-System Change not Climate	Mexicanas
Change	Community Reformed Church
Beth Eden Baptist Church	Conejo Climate Coalition
Breast Cancer Action	Consumer Watchdog
Breathe Southern California	Cornerstone Community Church
CA Youth Versus Big Oil	Courageous Resistance Indivisible of the
California Alliance for Community Energy	Desert
California Climate Voters	Double Rock Baptist Church
California Environmental Justice Coalition	East Bay Chapter - Electric Vehicle
(CEJC)	Association
California Religious Action Center of	East Bay Clean Power Alliance
Reform Judaism	Ebenezer Missionary Baptist Church
Californians for Western Wilderness	Eco Chicos
Center for Biological Diversity	ECOSLO - Environmental Center of San
Center for Community Energy	Luis Obispo
Central California Environmental Justice	El Dorado Progressives
Network (CCEJN)	El-Bethel Baptist Church
Change Begins With ME (Indivisible)	Elders Climate Action
Citizens' Climate Lobby, Ventura County	Elders Climate Action, NorCal Chapter
Chapter	Elders Climate Action, SoCal Chapter
Citizens' Climate Lobby, Santa Clarita	Endangered Habitats League
Chapter	Environment California
City of Oakland	Environmental Democrats, Sacramento

Environmental Justice Coalition for Water
Equity Builders of California
Extinction Rebellion San Francisco Bay
Area
FECADEMIN
Feminists in Action, Indivisible CA 14
Food & Water Watch
Fossil Free California
Fresnans Against Fracking
Fridays for Future, Fresno
Fridays For Future, Sacramento
Green the Church
Greenaction for Health and Environmental
Justice
Greenbank Associates
GreenFaith
Greenpeace USA
Hammond Climate Solutions Foundation
HB Huddle
Hillcrest Indivisible
Home & Foreign Mission District
Association
Human Impact Partners
Humboldt County Democratic Central
Committee
Indivisible CA Green Team
Indivisible Marin
Indivisible Media City Burbank
Indivisible Northridge Resistance
Indivisible OC 36
Indivisible OC 48
Indivisible Resistance San Diego
Indivisible ReSisters Walnut Creek
Indivisible Sacramento
Indivisible San Francisco
Indivisible San Jose
Indivisible Simi Valley
Indivisible Sonoma County
Indivisible Ventura
Indivisible Yolo
Local Clean Energy Alliance
Maximum Solar Properties
Mojave Desert Land Trust
Morongo Basin Conservation Association
Mothers Out Front, California
National Community Renaissance

National Parks Conservation Association
Natural Heritage Institute
New Avenue ADUs and Compounds
Nicholson Energy Consulting
Northern California Earth Institute
Northern California Solar Energy
Association
Oil and Gas Action Network
Ojai Climate Emergency Mobilization
Committee
Partnership for a Healthy Community
People Acting in Community Together
Pilgrim Rest Missionary Baptist Church
Plumas County Democrats Central
Committee
Progressive Democrats of America-
California
Progressive Democrats of the Santa Monica
Mountains
Project Green Home
Public Power San Diego
Puente Latino Association Inc.
Redwood Energy
Rooted in Resistance (Indivisible)
Sacramento Climate Coalition
Safe Energy Now
San Diego Green Building Council
San Francisco Bay Physicians for Social
Responsibility
San Joaquin Urban Native Council
San Joaquin Valley Democratic Club
San Luis Obispo Mothers for Peace
San Ramon Valley Climate Coalition
SanDiego350
Santa Barbara County Action Network
Santa Barbara Standing Rock Coalition
Santa Cruz Climate Action Network
Save Union City Hills
School Energy Coalition
Silicon Valley Youth Climate Action
SLO Climate Coalition
Small World Strategy
Society of Fearless Grandmothers
St. Andrew Missionary Baptist Church
St. Paul AME Church
Stand.earth

Strike Debt Bay Area
Sunflower Alliance
Sunrise Long Beach
Sunrise Movement Santa Barbara
Sunrise San Luis Obispo
Temple Sinai
The Climate Center
The Climate Mobilization - San Diego
The Environmental Working Group
The Protect Our Communities Foundation
The Rasmus Institute
The Way Christian Center
Todos Unidos
Tri-Valley Democratic Club
Twenty Third Ave. Church of God
Valley Women's Club of San Lorenzo Valley
Ventura Climate Coalition
VIBE - Verdani Institute for the Built
Environment
Vibe Solar
Wellstone Democratic Renewal Club
West Berkeley Alliance for Clean Air and
Safe Jobs
William J. Worthen Foundation
Williams Chapel Baptist Church
Youth Vs. Apocalypse
Youth4Climate