

CPUC Docket R.20-08-020 (Virtual Net Energy Metering)

To: California Public Utilities Commission

cc: Governor Gavin Newsom

We are writing to express concern about proposals from California utilities and from the Public Advocates Office of the California Public Utilities Commission that would impact the ability of multifamily housing, schools, and farms to install on-site solar generation and energy storage.

The Commission recently issued a decision that changed the rules for rooftop solar in California. The changes vastly reduced the credit value for energy exported to the electric grid, but importantly, still allow customers to buy less energy from the utilities when they use their generated or stored energy on-site in real time.

The CPUC's decision only applies to customers that install solar in association with a single utility meter. The Commission is now considering related changes for properties with multiple utility meters. It is essential that California gives multimeter properties the same opportunity to install on-site clean energy as single-meter properties.

It is common for some types of customers to have multiple meters on one property. Multifamily housing has different electric accounts for each unit. School campuses typically have separate meters for separate buildings. Most farms have multiple irrigation wells that are separately metered. In each of these cases, it is impractical for the customer to install a separate solar array and battery for each meter. The solar tariffs should continue to allow customers to install solar and storage systems for the energy needs of the property as a whole.

However, proposals made by the utilities would deny multimeter properties the ability to buy less power from the utilities when they consume power directly from on-site solar. It would force tenants, schools and farms to buy all of their power from the utility even when it is generated on their own rooftop or field. It would be fundamentally unfair to allow customers with only one electric meter to distinguish between on-site usage and exports while not allowing customers with multiple meters to do the same.

The proposal from the Public Advocates Office is even worse. It would eliminate the very existence of a tariff that allows customers with multiple meters to install on-site solar and storage with any amount of export credit.

We urge the Commission to reject both of these proposals and instead approve a tariff that includes property netting as well as a transition toward lower export rates to ensure a reasonable glidepath for the customer solar market.

We applaud your leadership in maintaining California as a global leader in achieving high renewable energy goals. Thank you for your consideration.

Thank you,

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