

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the Self-
Generation Incentive Program and Other
Distributed Generation Issues.

Rulemaking 12-11-005
(Filed November 8, 2012)

**CLEAN COALITION COMMENTS ON PROPOSED DECISION ADOPTING NET
ENERGY METERING BILL CREDIT ESTIMATION METHODOLOGY FOR
GENERATING FACILITIES PAIRED WITH SMALL STORAGE DEVICES**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Clean Coalition respectfully submits these comments on the *Proposed Decision Adopting Net Energy Metering Bill Credit Estimation Methodology for Generating Facilities Paired with Small Storage Devices* (“PD”), dated March 4, 2016. The Clean Coalition strongly supports the Commission’s proposed decision to adopt a methodology that provides the greatest system benefits and preserves flexibility for customers.

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”)—such as local renewables, advanced inverters, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions. The Clean Coalition also collaborates with utilities and municipalities to create near-term deployment opportunities that prove the technical and financial viability of local renewables and other DER.

II. Comments

The Clean Coalition strongly supports the Commission’s proposed decision to adopt an estimation methodology for determining Net Energy Metering (“NEM”) credits for storage devices with a capacity of 10 kW or less that have been installed as an addition or enhancement to NEM-eligible generation facilities. The Commission’s adoption of the second estimation methodology proposed in the November 4, 2014 Assigned Commissioners Ruling that caps NEM credits for exports based on modeled monthly generation is preferable because it provides the greatest system benefits. Unlike the first methodology, the adopted methodology better facilitates storing surplus generation during non-peak periods for export during peak periods. Feeding energy back to the grid during peak periods provides the highest value to the grid and addresses issues with solar PV’s status as an as-available resource. As the PD recognized, “Method 2 alleviates the IOUs’ concern with [distributed generation] by allowing storage devices to store customer-sited solar generation mid-day when solar production peaks, and dispatch that energy for compensated export to the grid later in the day, while still capping NEM credits based on a system’s estimated monthly generation profile.”¹ The Clean Coalition also supports the Commission’s decision to preserve flexibility and allow customers with small, paired systems to opt-in to the NEM multi-tariff requirements.

Additional proposals by SolarCity, the Interstate Renewable Energy Council (“IREC”), and the California Energy Storage Alliance (“CESA”) further strengthen the Commission’s proposed decision. First, SolarCity and IREC proposed that the utilities provide customers access to smart meter or comparable data to track total exports, with no more than a twenty-four-hour delay.² Customers should be able to easily access their own energy usage and export data from the utilities or directly from their meter, as is provided under the Green Button option for customers and third-party providers. Adopting this proposal will improve transparency and data accessibility. California utilities have taken very positive steps in this direction and the Clean Coalition encourages further data access enhancement and refinement as warranted. Second, CESA proposed to preserve options to more accurately model energy production, which will

¹ PD at 21.

² PD at 24.

provide greater flexibility to use the best modeling methodologies.³ The Clean Coalition respectfully urges the Commission to expeditiously schedule a workshop to resolve both of these issues.

III. CONCLUSION

The Clean Coalition appreciates this opportunity to comment on the PD and supports the Commission's work to promote NEM systems coupled with storage that provide the greatest overall benefits to the grid.

Respectfully submitted,



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³ PD at 21–22.