

**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
(Filed August 27, 2020)

**REPLY COMMENTS OF THE CLEAN COALITION ON PROPOSED DECISION
ADDRESSING REMAINING PROCEEDING ISSUES**

/s/ BEN SCHWARTZ

Ben Schwartz
Policy Manager
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573
ben@clean-coalition.org

August 28, 2023

**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
(Filed August 27, 2020)

**REPLY COMMENTS OF THE CLEAN COALITION ON PROPOSED DECISION
ADDRESSING REMAINING PROCEEDING ISSUES**

I. INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (“the Commission”) Rules of Practice and Procedure of the California Public, the Clean Coalition respectfully submits these reply comments in response to the *Proposed Decision Addressing Remaining Proceeding Issues*, issued at the Commission August 2, 2023. Clean Coalition reply comments will highlight the following points:

- It is difficult to get answers from the investor-owned utilities (“IOUs”) about questions related to VNEM, including information on websites or from customer-facing departments. Getting answers requires VNEM experts that are not available to the public. We asked questions about:
 - Deploying microgrids and enabling resilience.
 - Basic VNEM compensation structures.
 - Oversizing solar and energy storage requirements.
 - How to deploy storage with the requirement that storage cannot charge from the grid.
- This PD does not make it easier to deploy storage or enable resilience. Moreover, the proposal for no netting makes it less valuable for VNEM customers to manage on-site consumption or enable flexible demand.
- The Commission is sending a very clear message by reducing the value of a program utilized by low- and middle-income Californians renting their households.
- We agree with Ivy Energy and CALSSA that VNEM energy is almost entirely used on-site and the rest of energy is used on the same feeder.

The Clean Coalition is concerned that the Commission is going in the wrong direction with this PD, both economically and in terms of the signals being sent to Californians living in

multifamily housing who do not have other options for deployments of renewable energy. Moreover, there are improvements needed to ensure that customers can actually get questions answered in a timely manner; the existing VNEM program is confusing, and the PD would implement a Successor program that is even less transparent and easy-to-understand.

II. DESCRIPTION OF PARTY

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, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and urges the Commission to reject this PD, adopt the

/s/ BEN SCHWARTZ

Ben Schwartz
Policy Manager
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573
ben@clean-coalition.org

Dated: August 28, 2023