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January 17, 2014

ED Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Submitted electronically to [EDtariffunit@cpuc.ca.gov](mailto:EDtariffunit@cpuc.ca.gov)

**Subject: Récolte Energy’s Support of PG&E’s Revised Advice 4305-E-A Filing**

Dear Energy Division Tariff Unit:

On October 31, 2013, Récolte Energy (Récolte) had protested PG&E’s Advice 4305-E Filing, dated October 21, 2013, based on the following three concerns:

1. Definition of “adjacent”
2. Method of computing proportionate allocation for each billing period
3. Effective Date of PG&E’s Advice 4305-E Filing

Récolte had recommended

- that the Commission clarify that meters on properties that are contiguous to each other, and therefore adjacent (near) the parcel on which the generation facility is located, are eligible for load aggregation.
- that, to avoid causing billing errors and violating statutes, PG&E revise its method of calculating proportionate allocations each billing period, by taking into account cumulative usage and production allocations, when calculating current month production allocations.
- that PG&E’s Advice 4305-E Filing become effective on the date of approval.

**In its revised advice filing 4305-E-A, dated January 16, 2014, PG&E has addressed all these issues to Récolte’s satisfaction.**

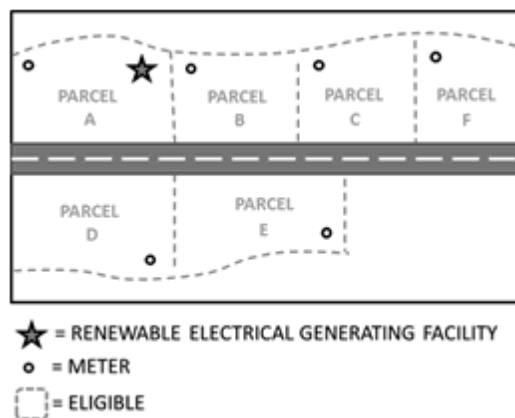
1. Definition of “adjacent”

Special Condition 8, Load Aggregation, in PG&E’s Electric Schedule NEM Net Energy Metering Service, now reads:

... Customer-generators are eligible to participate in Load Aggregation provided that all meters in a Load Aggregation Arrangement are located (i) on the property where the renewable electrical generation facility is located, or (ii) are located within an

unbroken chain of contiguous parcels that are all solely owned, leased or rented by the customer-generator. **For purposes of Load Aggregation, parcels that are divided by a street, highway, or public thoroughfare are considered contiguous, provided they are within an unbroken chain of otherwise contiguous parcels that are all solely owned leased or rented by the customer-generator, as verified in Form 79-1153 [Emphasis added].**

For example, assume there are five parcels (A, B, C, D, E, and F) that form a cluster of contiguous parcels and D and E are separated from A, B, C and F by a street, highway, or public thoroughfare. For the purposes of participating in Load Aggregation, all five parcels are considered contiguous, provided they are otherwise contiguous and all are solely owned, leased or rented by the customer-generator. Refer to Diagram 1 (for illustrative purposes only).



## 2. Method of computing proportionate allocation for each billing period

Special Condition 2.d., for a customer-generator electing Load Aggregation, in PG&E's Electric Schedule NEM Net Energy Metering Service, now reads:

For each monthly billing period, the energy (kWh) exported to the grid (in kilowatt-hours or kWh) by the Renewable Electrical Generation Facility shall be allocated to each of the Aggregated Account meters (kWh reading), as well as the Generating Account if it has load, **based on the cumulative usage at each aggregated account and the cumulative generation from the generating account from the start of the Relevant Period. [Emphasis added]** At the end of the month, once the allocation proportions are known, the kWh for each Generating Account meter interval will be allocated to each of the Aggregated Accounts for the corresponding interval.

## 3. Effective Date of PG&E's Advice 4305-E-A Filing

PG&E reduced the time requested for its Tier 2 advice filing to become effective from 120 calendar days to 30 calendar days.

**With these changes, Récolte concerns have been addressed. Récolte now supports PG&E's Revised Advice 4305-E-A Filing.**

Récolte greatly appreciates the Energy Division and PG&E's collaborative efforts in making Load Aggregation a reality for customer-generators in California and thanks all parties for their thoughtful participation in this matter.

Regards,



Gopal Shanker  
President

Cc: President Michael R. Peevey  
Commissioner Mark J. Ferron  
Commissioner Michel P. Florio  
Commissioner Catherine J.K. Sandoval  
Commissioner Carla J. Peterman  
Edward Randolph, Director, Energy Division  
Karen Clopton, Chief Administrative Law Judge  
Frank Lindh, General Counsel  
Gabe Petlin, Energy Division  
ED Tariff Unit  
Service List attached to Resolution E-4610