



CALIFORNIA FARM BUREAU FEDERATION

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Sent via E-Mail

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September 5, 2013

ED Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Draft Resolution E-4610/Support for Adoption

Energy Division Tariff Unit:

In accordance with the schedule established, the entities listed below (all of the listed entities have authorized California Farm Bureau Federation to submit this response on their behalf) support and urge adoption of Draft Resolution E-4610 without change, which addresses Senate Bill 594 (Wolk, 2012). Passed and signed into law in 2012, SB 594 authorized, within specified parameters, the ability of customers with multiple meters to aggregate the electrical load of the meters for purposes of net metering.

Draft Resolution E-4610 presents the required findings SB 594 directed be made prior to implementation. It verifies that allowing eligible net metering customer-generators, who aggregate their load, will not result in an increase in the expected revenue obligations of customers who are not eligible customer-generators. The findings are substantially supported by multiple levels of cost analysis, which elements have been consistently shown when the impacts of aggregation of eligible accounts are addressed. The assumptions made are reasonably based in pragmatic applications of how customers use their energy. For many customers the ability to aggregate provides a feasible path forward to match their load to an appropriate site for customer generation.

The thorough review of the matter made by Energy Division is evident and strongly supports approving the Draft Resolution. We appreciate the opportunity to

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comment and urge the Commission to expeditiously finalize the necessary requirements to allow customers to move forward with aggregation consistent with SB 594.

Respectfully submitted,



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Michael Boccadoro
Agricultural Energy Consumers Association

Jeanne Merrill
California Climate & Agriculture Network

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California Cotton Growers Association

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California Cotton Ginners Association

Jeff Shields
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cc: Michael Peevey, President
Mike Florio, Commissioner
Catherine Sandoval, Commissioner
Mark Ferron, Commissioner
Carla Peterman, Commissioner
Gabe Petlin, gp1@cpuc.ca.gov
Rulemaking 12-11-005 Service List
Mr. Edward Randolph, Director of the Energy Division
Ms. Karen Clopton, Chief Administrative Law Judge
Mr. Frank Lindh, General Counsel
Senator Lois Wolk