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Distributed Generation Law

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VIA EMAIL

Curtis Seymour, CPUC – Energy Division, css@cpuc.ca.gov
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Re: Post-Workshop Comments for the Virtual Net Metering for Multifamily Affordable Solar Housing (MASH) Tariff

The Interstate Renewable Energy Council¹ (“IREC”) would like to thank Curtis Seymour and the California Public Utilities Commission (“Commission”) for hosting the January 8, 2009 workshop to discuss virtual net metering implementation. The workshop facilitated a lively dialogue that provided IREC with insight into key implementation issues and helped elaborate the views of the stakeholders.

IREC would like to commend Commission Staff and the utilities for putting forward a solid proposal for virtual net metering for multifamily affordable solar housing. The diligence and thoughtfulness of those involved shows through in the product.

There are just two issues that IREC would like to comment on briefly. First, IREC notes that Decision 08-10-036 expresses support for third-party financing arrangements recognizing that such arrangements “may facilitate the deployment of solar energy in affordable housing, thereby providing benefits to affordable housing tenants.” With this in mind, IREC respectfully requests that utility virtual net metering tariffs contain language that reflects compatibility with third-party financing.

IREC’s second comment relates to the possibility of tenant vacancies. There was comment at the workshop that vacancies are infrequent and typically short in duration. That may be true, but that does not mean that vacancies do not occur or are always short in duration. From time-to-time, a multifamily housing unit may need repair or even major renovation. This may be necessitated by an earthquake, a change in building code, erosion of a building’s foundation, damage from severe weather, or some other foreseen or unforeseen event. In such cases, it

¹ For over two decades, IREC has worked as a non-profit organization to accelerate the sustainable utilization of renewable energy resources. With funding from the United States Department of Energy, IREC’s mission includes assisting policymakers in identifying “best practices”¹ in the areas of interconnecting and net metering distributed renewable energy technologies. To that end, IREC has participated in workshops, proceedings and rulemakings before over eighteen state public utility commissions during the past two years. IREC was active in the development of interconnection rules in Florida, Illinois, New Mexico, North Carolina, Utah, Virginia and to a lesser extent, California, Colorado, Maryland, South Dakota and the District of Columbia. For net metering, IREC was active in rulemakings in Alaska, Arizona, Colorado, Florida, Kentucky, Massachusetts, New Jersey, Nevada, New York, North Carolina, Ohio, Oregon, Utah, Texas and Virginia. IREC has also developed model interconnection procedures and model net metering rules that reflect “best practices” in these areas.

would be helpful to have a mechanism that preserves the benefits of solar generation for on-site residents instead of having energy flow uncompensated to a utility. Decision 08-10-036 forecloses the possibility of reallocating credits other than every five years, and even if the five year period happened to be soon, the current proposal offers no means for excluding certain units from the allocation of generation credits. To remedy this situation, IREC would like to suggest that in situations where there is no active customer account available to receive an allocation of solar generation credits that the allocation be held over as an excess kilowatt hour credit on the generating system account. This will allow the credits to be reallocated according to the typical percentage formula during the following month.

IREC believes the incorporation of these suggestions will strengthen an already solid proposal and help facilitate the deployment of solar energy in affordable housing, thereby providing benefits to affordable housing tenants. IREC would like to thank Commission Staff for the opportunity to submit these post-workshop comments.

Dated this 16th day of January 2009.

Respectfully submitted,

/s/Kevin T. Fox

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