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September 5, 2013

VIA ELECTRONIC MAIL

Energy Division
Attention: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
EDtariffunit@cpuc.ca.gov

**Re: Comments of the California Energy Storage Alliance on
Draft Resolution E-4610 – Net Energy Metering Aggregation**

Dear Energy Division Tariff Unit:

CESA appreciates the opportunity to provide these comments on Draft Resolution E-4610 (“Resolution”) issued by the California Public Utilities Commission’s (“Commission’s”) Energy Division in accordance with SB 594 (Wolk) (“SB 594”), in which the Commission finds that allowing eligible net energy metering (“NEM”) customer-generators to aggregate their load from multiple meters, pursuant to SB 594, will not result in an increase in the expected revenue obligations of customers who are not eligible customer-generators, and authorizes California’s investor owned utilities (“Utilities”)¹ to modify their NEM tariffs to implement the meter aggregation provision of SB 594 and orders them to file advice letters within fourteen (14) days of the issuance date of the Resolution to comply with SB 594.

Given the importance of the topic and the very recent proposed Commission decision mandating both distribution and customer sited energy storage, very often in conjunction with renewable generation, the same aggregation of load should be allowed to suffice for the

¹ The same determination should be applicable to NEM, NEMV and Non-NEM installations of energy storage in Pacific Gas and Electric Company, Southern California Electric Company, and San Diego Gas & Electric Company service territories.

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determination of premise load when sizing energy storage installations. Doing so will allow for more cost-effective installation and operation of distributed energy resources.

CESA requests that the Resolution be adopted by the Commission, as clarified in accordance with the foregoing discussion.

Very truly yours,



Donald C. Liddell
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DCL/md

cc: Michael Peevey, President (mp1@cpuc.ca.gov)
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