





CPUC Docket R.20-08-020 (Virtual Net Energy Metering)

To: California Public Utilities Commission

cc: Governor Gavin Newsom

The ability to stabilize energy costs with self-generation is essential for the economic health of the agricultural economy in California. Our success as farmers depends on affordable, reliable power. Because most farms have multiple irrigation wells that are separately metered, the net energy metering aggregation (NEMA) tariff has been an essential tool for farmers across the state to install self-generation. If agricultural customers cannot aggregate the load of multiple meters on contiguous properties, very few of them can make on-site solar work.

A utility proposal on changes to NEMA would bill farmers as if they are not using any of the power they are generating. It would treat multi-meter properties differently from single-meter properties, counting all generation as exports that are compensated at values derived from the flawed Avoided Cost Calculator. The CPUC must reject this proposal.

The fact that there are multiple meters on a property should not result in completely different treatment compared to single-meter properties. The CPUC recently adopted a decision creating the net billing tariff (NBT), which distinguishes between energy that is produced and consumed on-site and energy that is exported to the grid. The value of exported energy under NBT is a fraction of previous NEM credit value, but customers are still permitted to buy less energy from the utilities when they generate their own power in real time. Allowing customers with single meter properties to use power they generate and denying customers with multi-meter properties the ability to do so would be discriminatory and unfair.

The proposal from the Public Advocates Office is even worse. It would eliminate NEMA altogether under the theory that farms could enroll in a future “community solar” program. Such a program has not been developed or approved. There is no assurance that there would be significant opportunities for farms to participate. The proposal is hostile to agriculture and must be rejected.

Being a California farmer or agricultural business is not getting any easier. Every year it is more of a battle than ever to stay operational. Running the packing houses, cold storage facilities, shipping centers and farmland needed to grow food is costly. Nearly all inputs for farmers are becoming more expensive each year, and income fluctuates widely with the success or failure of each year’s harvest. Installing solar through NEMA has helped farmers like us reduce swings in profit and loss and keep us in business.

Installing solar also helps facilitate the electrification of farming operations. The state has pushed us to convert irrigation wells to electric pumps and is now pushing us to use electric tractors and other electric equipment. Compliance with these rules is much more practical if we are able to generate our own power.

The next version of NEMA must include netting across contiguous properties – the ability to use power on-site at the same moment it is generated or discharged from a battery without having to transact with the utility for those electrons. The tariff should also include an export rate adder in the early years to create a transition glidepath.

Thank you,

Harris Ranch, Coalinga
California Climate and Agriculture Network (CalCAN), Sacramento
Poco Farm, Ojai
McGrath Family Farm, Camarillo
Grivey Orchards, Inc., Orland
Crain Walnut, Los Molinos
Double A Walnuts, Colusa
Ecological Farming Association, Santa Cruz
Occidental Arts and Ecology Center, Occidental
8686 Rio Vista LLC, Reedley
Aslan Cold Storage, Reedley
AV Thomas, Atwater
Barroso Dairy, Merced
Bee Sweet Citrus, Fowler
Booth Ranches, Orange Cove
Borba Farms, Aromas
Bright Orchards
Britz Farms, Fresno
Chaney Farms, Fresno
Circle K Ranch, Selma
Cobblestone Fruit, Sanger
Contente Farms
Craig Bowser Farms, Porterville
Critchley Farms, Reedley, Central Valley
Del Rey Packing Co, Del Rey
Diamond H Dairy, Chowchilla
DLM Farms, Fresno

Double G Farms, Le Grand
East Side Packing, Reedley
Fresh Select, Dinuba
Fruit World, Reedley
Grand View Dairy, Merced County
H&R Facilities, LLC
Hamilton Cold Storage Inc., Reedley
Harris Farms, Inc, Coalinga
Hines Family Farms, Sanger
Johnson Family Farms, Nevada City
Kazarian Farms, Selma
Kings River Packing, Sanger
Lanfranco Farms, Kerman
Live Oak Farms, Le Grand
Live Oak Packing
Lone Star Dehydrator, Sanger
Melkonian Farms, Sanger
Mike Woolf Farms, Firebaugh
Pappas Produce
Parkview Dairy, Delhi
PR Farms, Clovis
Running Luck Ranch, Parlier
Serrano Farms, Le Grand
Shasky Farms, Le Grand
Soares Pistachio Farms, Lemoore
Sun Harvest Partners, Fresno
Sun Valley Packing, Reedley

SunWest, Parlier

Vander Woude Dairy, Merced

Youngstown Grape Distributors Inc., Reedley

Homen Dairies, Merced

Fresno County Farm Bureau, Fresno

O'Neill Vintners & Distillers, Parlier

Woolf Farming, Huron

Romanini Brothers, Bakersfield

D'Arrigo Brothers Company of California, Salinas

RTS Agribusiness

M&T Chico Ranch, Chico

Donald Leinfelder Farms, Stockton, San Joaquin County

Reason Farms, Sutter County

Lindauer Farm Management, INC, Los Molinos

Jim Churchill, Tangerine grower, Ventura County

Goose Valley Ranch, Shasta County

Triple S Farms, Chowchilla

Markarian Family L.P., Madera

Risk Mitigators & Advisors, Clovis

Piedra Organic Partners, Inc., Sanger

Bloemhof Farms, Shafter

Raven Farms, Kingsburg

Pacific Ag Management, Wasco

Fowler Packing, Fresno

Solar Rights Alliance