



June 23, 2023

President Alice Busching Reynolds  
California Public Utilities Commission  
535 Van Ness Ave  
San Francisco, CA 94102

Pres. Reynolds,

Schools, community colleges, and universities are important locations for the installation of solar and storage. They are public entities located in every community, with public budgets and a community focus. California's public schools, community colleges, and universities use on-site

solar and storage to manage their difficult finances, so they can target their limited resources toward their community-based mission.

Unlike others in the commercial class, local educational agencies cannot raise product prices to cover increases in operating expenditures. Increases in energy expenditures directly reduce funding for educational services. Rising energy costs take money directly out of the classroom. The state needs to make sure it is maintaining opportunities for schools, community colleges, and universities to adopt on-site solar and storage.

The CPUC is currently considering changes to net energy metering aggregation (NEMA), the tariff used on many campuses with solar. Proposals from the utilities and the Public Advocates Office would make it economically unfeasible for schools, community colleges, and universities to install solar and storage. The CPUC must reject those proposals.

The central feature of on-site solar is the ability to consume generated energy in real time or store it on-site for direct consumption later, thereby reducing the amount of energy purchased from the utility. This allows schools, community colleges, and universities to reduce their energy costs while also reducing their burden on the electric grid. The next version of NEMA must include property-wide netting – 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.

Most school, community college, and university campuses have multiple utility accounts. This is often a function of school, community colleges, and universities facility funding mechanisms that only fund modernization every 25 years. Sites end up with multiple generations of technology and multiple meters.

Not all school, community college, and university buildings are suitable for solar generation equipment, and especially not for solar storage equipment due to setbacks required by Fire Code. Installing solar generation and storage equipment on each meter at a school, community college, and university site does not make financial sense. Schools, community colleges, and universities need the flexibility to install energy facilities in association with multiple meters.

The fact that there are two meters on a property should not result in completely different treatment compared to single-meter properties. The Commission 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.

The utility proposal would treat multi-meter properties differently from single-meter properties, counting all generation as exports compensated at values derived from the flawed Avoided Cost Calculator. It is a fiction to claim that all on-site solar generation is exported to the grid when much of it never touches the electric grid. It would be grossly unfair to require schools, community colleges, and universities to pay the utility for their own self-generated energy. Allowing customers with single meter properties to use power they generate in real time and

denying customers with multi-meter properties the ability to do so would be discriminatory against our customer class.

The proposal from the Public Advocates Office is even worse. It would eliminate NEMA and replace it with an inferior, untested, and unapproved community solar program. Enrolling a school, community college, or university in a faraway, multi-megawatt solar project would do nothing to build community resilience and would likely have minimal impact on energy costs. We need solar and storage *in* our communities.

The next version of NEMA for schools, schools, community colleges, and universities as well as other customers with multiple utility accounts at one location must include property-wide netting, and should also include an export rate adder in the early years to create a transition glidepath.

Thank you,

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