



DRA

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JOSEPH P. COMO
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June 28, 2013

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 13-IEP-1
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

13-IEP-1

TN # 71470

JUNE 28 2013

Subject: Docket Number 13-IEP-1: Comments on Petition for Societal Cost-Benefit Evaluation of California's Net Energy Metering Program

The Division of Ratepayer Advocates (DRA) is an independent division of the California Public Utilities Commission (CPUC) created by state legislation. DRA's mission is to obtain the lowest possible consumer rates for utility services consistent with safe and reliable service.

Thank you for this opportunity to provide comments regarding the June 5, 2013 Petition for Societal Cost-Benefit Evaluation of California's Net Energy Metering Program ("Petition"). Like energy efficiency and demand response, customer-side distributed generation is an important means for advancing California's greenhouse gas reduction goals. If the California Energy Commission (CEC) grants this Petition, DRA recommends that the CEC consider current efforts at the CPUC to develop a societal cost test as a possible fifth test for evaluating all demand-side energy programs, including customer-side distributed generation.

Specifically, the CPUC's Energy Division staff held a workshop on June 13, 2013 to present and discuss a proposal for evaluating societal costs and benefits of the State's demand-side energy programs, including customer-side distributed generation.¹ To minimize duplication of efforts and in the interest of consistency, DRA respectfully requests

¹ For reference and further information, see the CPUC's Energy Efficiency/Demand-Side Cost-Effectiveness webpage: <http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Cost-effectiveness.htm>. Energy Division staff indicated that it would solicit stakeholder comments on its societal cost test proposal.

that CEC staff consult with CPUC Energy Division staff with the objective of employing the same, or at least easily comparable, methodologies for estimating the societal costs and benefits of all demand-side resources.

Respectfully submitted,

Division of Ratepayer Advocates staff

Please contact Valerie Kao at (415) 703-1341 if you have any questions about these comments.

/s/ Michael Campbell

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