



California Energy Commission
Dockets Office, MS-4
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June 28, 2013 California Energy Commission

DOCKETED

13-IEP-1

TN # 71464

JUNE 28 2013

RE: Docket No. 13-IEP-1– Comments on Petition for Societal Cost-Benefit Evaluation of California’s Net Energy Metering Program

Dear Chair Weisenmiller and Commissioner McCallister,

Environmental Health Coalition (EHC) supports the petition submitted on June 5, 2013 by the American Lung Association in California, the California Environmental Justice Alliance, and other parties requesting that the California Energy Commission (CEC) perform a societal cost-benefit evaluation of California’s Net Energy Metering (NEM) Program.

For over three decades, EHC has fought toxic pollution in the San Diego region. Low-income communities of color in San Diego’s urban core have some of the highest rates of pollution, unemployment and underemployment, poverty and asthma in the County; they have the least solar PV infrastructure; and they will be hit first and worst by climate change. This is why EHC communities— in much higher rates than the County average— support solutions to bring clean energy investment and jobs to the region. In fact, nearly three-quarters of the low-income residents we polled would be willing to pay more on their utility bills if it would result in more solar in their neighborhoods.

EHC supports pursuing a multitude of pathways to meet climate goals, reduce pollution, and bolster the local clean energy industry to reach its full potential of becoming truly affordable and accessible for all. Although there is still some lag in reaching low-income communities, net metering is a foundational policy that is helping achieve California’s clean energy and climate change goals, including the goal set by Governor Brown to install 12 GW of local renewable distributed generation by 2020 and the CEC’s goals for the New Solar Homes Partnership and Zero Net Energy for new homes and commercial buildings.

By providing fair credit for the benefits solar systems provide to the grid and other ratepayers, net metering allows homeowners, schools and other public entities, and businesses to control their electricity costs and invest the savings in other priorities. Net metering also has helped leverage billions of dollars in private investment in California and helped to create more than 43,000 solar jobs in the state – one of the fastest growing sectors of our economy. Finally, net metering provides air quality benefits by reducing the need for dirty fossil fuel peaker plants.

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NEM is a critical tool in meeting the state's climate goals and democratizing our energy system and it has the potential to be even more successful. We support two key steps to strengthen and sharpen this tool: First, the societal and economic benefits of the program must be formally quantified for consideration by policy-makers, and this data can supplement the forthcoming cost-effectiveness evaluation of net metering by the California Public Utilities Commission, which has taken the lead in implementing the state's net metering law. Second, as a next step we support identifying gaps in the program's reach and implementing solutions to better reach low-income communities with both PV infrastructure and job opportunities.

We respectfully request that you take the first step in strengthening our tools to address the state's climate and energy needs by granting the petition and performing the societal cost-benefit study requested by the petitioners.

Thank you for your consideration.
Sincerely,



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