

# Public Comment

June 23, 2022

RCEA Board of Directors  
Meeting

**From:** [Paul Woodworth](#)  
**To:** [Aisha Cissna](#); [Public Comment](#)  
**Subject:** RCEA 6/23 Agenda Item 3.4  
**Date:** Wednesday, June 22, 2022 7:22:58 PM

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To Regulatory and Legislative Policy Manager Aisha Cissna, RCEA Board Members, and Staff:

Thank you so much for participating in California's net energy metering (NEM) proceedings! The Joint CCA comments to the CPUC are expert, constructive and clear that RCEA supports a viable NEM incentive program for customer-owned rooftop solar and storage. We really appreciate the effort behind this and hope the CPUC adopts the Joint CCAs approach.

The one important issue the Joint CCA comments did not make clear is that Non-Bypassable Charges (NBCs) should continue to be added only to net consumption, not gross consumption. This has been RCEA's position as stated in the May 2022 board packet, "customers with customer-sited distributed generation should pay the same set of non-bypassable charges as any other customer for their *net consumption*." (emphasis added).

Currently NBCs are paid per the total amount of energy customers use from the grid. The CPUC is considering also charging NBCs on electricity solar users produce and use on-site, not from the grid. Not only would this be a tax on behavior we want to encourage (producing, storing, and using clean energy on-site), the CPUC does not and should not have jurisdiction behind-the-meter of solar users. Additionally, if this were to go forward, either a second meter would need to be installed at each site to track self-consumption, or the NBCs would be billed to solar customers based on estimates of gross consumption. Current PG&E estimated solar production calculations are a service territory average, estimates that are inaccurately high for Humboldt County. Presumably, these same inaccurate calculations would be used for estimating behind-the-meter solar energy usage. Adding Non-Bypassable Charges to gross consumption is a "solar tax" just like the proposed Grid Participation Charge.

For these reasons we encourage RCEA, when submitting reply comments to the CPUC, to clearly state opposition to NBCs on behind-the-meter energy consumption.

Thank you for all you do,

Amber Woodworth  
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Joshua Ponce

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