





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