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August 24, 2022

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Proposed Decision 20-08-020 – Reforms to Rooftop Solar Program, Long Overdue

Dear Commissioners:

We urge you to take long overdue action to enact meaningful reforms to the state’s rooftop solar program, Net Energy Metering (NEM). Meeting California’s equity and decarbonization goals requires the elimination of the decades-long unfair cost burden on 90% of Californians without solar who are disproportionately renters and lower income residents.

It’s been 10 years since the legislature mandated the California Public Utilities Commission (CPUC) fix the cost burden on non-solar customers, and it’s been 254 days since proposed reforms were released last December.

Under the current NEM program, costs toward the electric grid that used to be shared more equitably by all customers are being disproportionately paid by non-solar customers. Every day that goes by without reform needlessly raises electricity bills by \$12 million a day. That means non-solar customers have paid nearly \$3 billion in higher electricity bills *so far this year*, or \$250 extra per year, per customer, to cover electric grid costs that are no longer being paid by solar customers. Without change, this amount will grow to more than \$550 a year.

The continued delay in making any meaningful updates to this nearly 30-year-old program has resulted in rooftop solar being the most expensive form of clean energy available.

Among the data and key findings that validate the urgency for reform:

- The CPUC’s [recent SB 695 report on affordability](#) identified NEM as one of “three critical and overlapping policy fronts” that “must be managed to address the risk that high electric rates and bills could slow California’s overall progress



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toward its electrification and climate goals, and harm some of the state’s most economically vulnerable residents.”

- University of California energy expert validates that [NEM disproportionately benefits the wealthy](#).
- The CPUC’s own analysis in this proceeding validates the [cost of NEM significantly exceeds the benefits of the program and raises rates](#).

The Commission has done a commendable job of balancing numerous competing interests and we appreciate the complexity of this issue. From a customer perspective, however, it is time for action and the solution is simple:

- ***Every customer that relies on the electric grid should pay their fair share.***

The very profitable solar industry’s sensationalized opposition to this simple concept is dumbfounding. Surely, we do not expect an increasingly shrinking population of Californians who don’t have or can’t afford rooftop solar to fund the reliability and resiliency of the electric grid for everyone? The solar industry’s claim that proposed reforms are discriminatory is not only false, but offensive to the millions of customers who have been paying an unfair and effectively regressive tax on their electric bills for years to fund the excessive subsidies mandated by this program.

Please ignore the hysteria and focus on the facts. It’s well past time for NEM reform.

Thank you for your consideration,

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California Senior Advocates League

Adriana Ayala, Executive Director
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