

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF AN INQUIRY)
INTO THE PROVISION OF)
NET METERING SERVICES)
BY ELECTRIC UTILITIES)**
_____)

Case No. 06-00241-UT

SUPPLEMENTAL REPLY COMMENTS
OF THE COALITION FOR CLEAN AFFORDABLE ENERGY

The Coalition for Clean Affordable Energy (“CCAIE”) agrees with Vote Solar that an extended true-up mechanism, that is, one which is not strictly limited to each billing cycle, with utility discretion, should be included. Vote Solar recommended the following language:

“The net energy delivered from the qualifying facility to the utility shall be credited in kWh at a 1:1 ratio, and those credits shall carry over to the subsequent billing period until all credits are used or the end of the calendar year is reached. At the end of the calendar year, any net excess shall be purchased by the utility at the utility’s applicable time-of-use or single period energy rate as described in 19.9.570.11.B.”

CCAIE recommends the following language instead, to be inserted in the same location as Vote Solar’s proposed language, which expands on Vote Solar’s suggestion but leaves the existing proposed rule intact, and which also tracks more closely with NMPRC Rule 571:

“The net energy delivered from the qualifying facility to the utility shall be credited in kWh at a 1:1 ratio. At the end of a billing period, the utility shall either:

a) Purchase any net excess at the utility's applicable time-of-use or single period

energy rate as described in 19.9.570.11.B.; or

b) Carry over any net excess to the subsequent billing period until all credits are used or the end of the calendar year is reached. At the end of the calendar year, any net excess shall be purchased by the utility at the utility's applicable time-of-use or single period energy rate as described in 19.9.570.11.B.; or

c) Carry over any net excess to the subsequent billing period, until such time that the qualifying facility leaves the system, whereupon the utility shall purchase any net excess at the utility's applicable time-of-use or single period energy rate as described in 19.9.570.11.B.”

We stress that this language only adds to the existing possibilities provided by the draft consensus rule compiled by Staff. In particular, option a) retains the single period billing true-up as proposed in the draft consensus rule. We support this part on the basis of comments made by some rural electric cooperative representatives in the discussions leading to the draft rule to the effect that they felt it would be unfair to their ratepayers if highly seasonal irrigation loads during one season, which form a very large part of some cooperative's loads, could be offset by renewable energy generation which happens to be inexpensive but occurs mainly in a different season.

At the same time we acknowledge Vote Solar's comments that an annual true-up “substantially reduces the complexity and administrative overhead associated with generating, accounting for, delivering, and tracking checks on both sides, and further encourages the appropriate usage of net metering as a means of reducing customer load.”

We therefore add options b) and c), allowing for annual and QF lifetime true-up options. Option b) is identical to the annual true-up proposed by Vote Solar, while the lifetime true-up is identical to an option in NMPRC Rule 571. The latter requires even less overhead and complexity than option b). We feel this should be included because there is really very little difference between, say, a 10 kw system interconnecting under Rule 571, and a 12 kw system interconnecting under the present rule, such that utilities should be given the option to treat both in the same way.

Respectfully submitted this 13th day of October, 2006.

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