

DOCKETED

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Dear Energy Commission Commissioners,

The cost for enforcement of billing rules should be determined prior to the Commissioners taking action on SMUD's application.

SMUD will be using Title 24, 10-115 (a) 3. Option B or C for the Neighborhood SolarShares program.

Pursuant to Public Utilities Code - PUC 2827. (i) (3) All costs and credits shall be shown on the eligible customer-generator's bill for each billing period.

SMUD says they may initially use an "off-bill" system to apply the Neighborhood SolarShares Charges and Credits and the \$10/kW or greater net benefit to participating customers.

Public Utilities Code - PUC 2827. (i) (3) prohibits any "off-bill" accounting of net metering and co-energy metering.

The Commissioners should require a docketed sample bill for the purpose of demonstrating full compliance with Title 24, 10-115 requirement that utility energy reduction credits will result in virtual reductions in the building's energy consumption that is subject to energy bill payments, including bill payments for taxes applicable to Neighborhood SolarShares.

I ask that the Commissioners not approve SMUD's application without docketed sample bill for Neighborhood SolarShares, thereby providing the commission with the most comprehensive record feasible in the proceeding prior to action being take on SMUD's application.

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