

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revisit Net Energy  
Metering Tariffs Pursuant to Decision 16-01-044,  
and to Address Other Issues Related to Net Energy  
Metering.

Rulemaking 20-08-020  
(Filed August 27, 2020)

**JOINT CCA REPLY COMMENTS TO SIERRA CLUB OPENING COMMENTS ON  
PROPOSED DECISION REVISING NET ENERGY METERING TARIFF AND  
SUBTARIFFS**

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Dated: December 5, 2022

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East Bay Community Energy (EBCE), San Diego Community Power (SDCP), and Peninsula Clean Energy Authority (PCE), (together “Joint CCAs”), respectfully submit these reply comments in response to Sierra Club’s opening comments on the *Decision Revising Net Energy Metering Tariff and Subtariffs*, issued on November 10, 2022.

As previously discussed in Joint CCA opening comments on the *Decision Revising Net Energy Metering Tariff and Subtariffs* issued on December 13, 2021, the Joint CCAs are supportive of Sierra Club’s recommendation to base glide path step-downs on each additional gigawatt of installed capacity rather than annual changes. Grounding the step-downs in installed capacity allows the glide path to respond to actual market conditions, as the step-downs will correspond to the speed at which solar is adopted.

The Joint CCAs appreciate the opportunity to submit reply comments in this proceeding and encourage the CPUC to consider this more effective approach.

Respectfully submitted,

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