

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

Order Instituting Rulemaking to
Develop a Successor to Existing
Net Energy Metering Tariffs
Pursuant to Public Utilities Code
Section 2827.1, and to Address
Other Issues Related to Net Energy
Metering.

Rulemaking 14-07-002

Application 16-07-015

And Related Matter.

**RESPONSE TO SCE ON MOTION TO RESTRICT THE NET-METERING
YEAR TO 12 MONTHS and ALLOW SOLAR PROVIDER
COMMUNICATION WITH IOU UNTIL SUCCESSFUL BILLING SETUP
UNDER NEM,
AKA THE ONE YEAR IS 12 MONTHS MOTION**

ALJ Kao permission to ABC Solar:

ABC Solar Incorporated is permitted to file a reply to Southern California
Edison Company's March 4, 2021 response.

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure,
written replies must be filed and served within 10 days of the last day for
filing responses, unless the administrative law judge sets a different date. By
this procedural communication, I am permitting ABC Solar Incorporated to
file its reply no later than March 31, 2021.

Also pursuant to Rule 11.1 of the Commission's Rules of Practice and
Procedure, ABC Solar Incorporated's reply must state in the opening

21 paragraph that the administrative law judge has authorized its filing and
22 that the administrative law judge set a final filing date of March 31, 2021,
23 and must state the date and the manner in which the authorization was
24 given (i.e., in writing, by telephone conversation, etc.).

25
26 In the interest of transparency I am serving this procedural communication
27 on the service list of Rulemaking 14-07-002 and Application 16-07-015.

28
29 First and foremost, ABC Solar Incorporated (ABC Solar) wishes to
30 express absolutely no malice or ill thought towards SCE or her staff. It is
31 only when the cries of clients reach past my staff and make it to my desk that
32 the president's office at ABC Solar is compelled to correct mistake in
33 procedure that when fixed will make the processes better for all stakeholders.

34 ABC Solar clearly is a stakeholder and has standing in this motion and
35 these proceedings. First, I point to ALJ Kao granting permission to ABC
36 Solar to reply to SCE. It is ABC Solar, not BARTZ that is doing this. SCE
37 may remember that a corporation is a person under our laws, also I, as
38 BARTZ, do represent ABC Solar.

39 ABC Solar has clear standing as a member of this rulemaking body and
40 that this motion is for the "whole good" not just ABC Solar or its harmed
41 clients.

42 ABC Solar has clear standing has as harmed person in that SCE has
43 indeed failed on NEM billing to such a large degree that it has caused client
44 to ABC Solar breakdowns that one is now in court.

45 ABC Solar is standing.

46 CLARITY OF MOTION

47 The ABC Solar motion of February 17, 2021, direct language from that
48 motion, e.g. nothing new is added or changed to the motion request:

- 49 1. A NEM Year is 12 months – Please order to SCE that a year is 12
50 months.
- 51 2. SCE needs to immediately inform every failed NEM billing account
52 that is over 30 days past PTO. Clients now must “discover” SCE’s
53 failure. That will not do.
- 54 3. It is my sincere hope that this rulemaking body will see the common
55 sense of a NEM year ALWAYS being 12 months and that solar
56 providers be granted the right to communicate on behalf of their
57 solar clients past PTO and up and until NEM billing is setup
58 correctly.

59 Please grant this motion.

60 ABC Solar stands by 100% its standing and that of this Motion:

61 MOTION TO RESTRICT THE NET-METERING YEAR TO 12 MONTHS and

62 ALLOW SOLAR PROVIDER COMMUNICATION WITH IOU UNTIL
63 SUCCESSFUL BILLING SETUP UNDER NEM, AKA THE ONE YEAR IS
64 12 MONTHS MOTION.

65 ABC Solar will take the opportunity now to respond to some of the
66 BARTZ is “mean...” SCE claims.

67 SCE Writes: On February 17, 2021, Mr. Bradley Bartz, a.k.a. ABC Solar
68 Incorporated, (hereinafter “Bartz”), filed what he styles as a motion but is in
69 actuality an adjudicatory complaint seeking 2 injunctive relief, a procedure and
70 remedy he has no standing to pursue, is not justified by evidence, and if granted,
71 would, at least in part, violate the due process and privacy rights of absent but
72 indispensable parties.¹

73 ABC Solar Answers: ABC Solar is relieved that SCE sees that the
74 motion has uncovered that their actions are so bad that an adjudicatory
75 complaint is in order. ABC Solar will support the CPUC if it takes such
76 action, but the motion regarding communication of the solar provider past
77 PTO and up and until NEM billing is set up properly, if granted, will help
78 relieve a bad-customer-service feedback loop.

79 SCE Writes: Bartz lacks standing to bring a complaint based upon damage
80 to individual customers, and the relief requested, access to private and confidential
81 customer information without prior, written authorization from the customer is
82 unlawful.

83 ABC Solar Answers: ABC Solar finds this answer from SCE to lack
84 credibility. 1st. SCE requires solar providers to a) provide a copy of the
85 ratepayer’s SCE bill and b) analysis of 12 months of actual usage so ask to
86 design a system based on history. Second, the ratepayer is forced to signed a
87 24 page CPUC disclosure document, again pointing the ratepayer to work
88 with the solar provider know their electrical usage cost and what new
89 appliances will be using electricity. It strains credulity that SCE claims
90 that up and until PTO that solar provider communication with SCE is ok, but
91 after PTO is granted and solar providers are cut off from communications.
92 Please note this used to be a non-issue for almost 20 years. SCE dutifully did
93 their job and connected solar adopters within 30 days after PTO. ABC Solar
94 has standing and the relief of being able to finish the ABC Solar promise to
95 the client to get them connected and running on the SCE grid can be realized.

96 SCE Writes: The only impact associated with the billing issues is a delay in
97 those credits appearing on the customers’ bills.

98 ABC Solar Answers: Dear ALJ Kao, please take this singular sentence
99 why SCE needs adult supervision. “The only impact” of a wrong bill is an
100 angry customer that writes things like this: “Sadly as of this moment I am in
101 the hole for \$32K, I’m still paying full fare for my power every month and I have a
102 noisy patio roof so this hasn’t been a success yet. I would appreciate your help
103 sorting this out.” ABC Solar Client Email. “ONLY” is a 100% absolute word. I call

104 foul on SCE as the ratepayer in our documented cases had more direct and financial
105 impact that a delay in their credits. SCE, because it is not following the rules, did
106 not inform clients of NEM Billing Failures in writing on day 31 as required. I
107 submit the whole of the report from SCE submitted on December 28, 2020 that
108 contains their public mea culpa that indeed they failed billing for a massive number
109 of clients. ABC Solar motion to continue communications with SCE after PTO and
110 up and until NEM billing is set up properly is warranted, needed and we pray is
111 granted.

112 SCE Writes: To help SCE's customers understand this issue, SCE sent letters
113 and emails to customers affected by the billing system issue in November and
114 December of 2019 notifying them that their account was affected, and that SCE was
115 working diligently to correct the issue. Specifically, SCE sent emails and hard copy
116 letters to residential NEM customers on November 21 and 25, 1 The "motion" is, in
117 many respects, unintelligible. SCE's response is therefore based upon its
118 understanding of what Bartz is trying to achieve based on the problem about which
119 he complains. 3 2019, respectively, and to business NEM customers on December 6,
120 2019. SCE also provided a NEM Billing Issue Frequently Asked Questions
121 document on its NEM page on SCE.com

122 ABC Solar Answers: ABC Solar fails to understand what SCE finds so
123 unintelligible about the motion. Indeed, the ABC Solar motion is not written by
124 attorneys or para-legal staff, it is written to point out an awfully specific pain-point
125 for all stakeholders the solar business. I know that ABC Solar clients who read the

126 original motion felt it expressed their pain. ABC Solar motion fixes a pain point
127 that is a communications blockade after PTO but before NEM billing success. Also,
128 2019, 2020, 2021 – all show numerous examples of failed billing by NEM billing.
129 20,700 according to the SCE insufficient report of December 28, 2020.

130 SCE Writes: SCE’s December 28, 2020 response to the Ruling explained that
131 SCE has, for the most part, rectified the problem and SCE expects to have
132 remaining issues associated with non-routine backlogs resolved in 2021.

133 ABC Solar Answers: “for the most part” feels like, except for ABC Solar
134 clients who we will fix last. Institution hazing by SCE of ABC Solar must stop.

135 SCE Writes: First, with respect to Rule 21, it governs interconnections,
136 including those conducted for NEM customers’ systems. Rule 21 does not apply
137 post-Permission to Operate (PTO) and thus does not apply to retail electric service
138 billing issues.

139 ABC Solar Answers: In English I would say one way, but in this document I
140 will say. ARE YOU KIDDING ME? Rule 21 applies. For SCE to say Rule 21 does
141 not apply post PTO means this rulemaking body has no meaning past PTO. Is that
142 true? I mean really?

143 SCE Writes: SCE is unaware of any customers filing formal adjudicatory
144 complaints with the Commission from the delay.

145 ABC Solar Answers: The process at the CPUC is for ratepayers to file their
146 notice of claim via the Consumer Affairs Bureau (CAB). To the ratepayer and ABC
147 Solar this is the start of an adjudicatory complain in that the CAB charter is to

148 identify failures that impact more than one ratepayer and show a trend. SCE legal
149 team may unaware, but that just means SCE line staff did not report conversations
150 with clients, CAB staff and SCE staff on these subjects.

151 SCE Writes: In fact, the relief requested would not have prevented the billing
152 delay about which Bartz complains. Even if there was a statute, regulation, or tariff
153 that controlled the billing issue here, computer programs are indifferent to the
154 presence of regulations governing the timing of events, and of course, despite best
155 efforts, there is always the potential for human error. What Bartz’s “motion” seems
156 to demand is administrative and operational perfection, which is not reasonable or
157 possible.⁵

158 ABC Solar Answers: ABC Solar is asking in this motion to be able to
159 communicate with its clients to be the turnkey solar provider for which it was hired
160 to do. ABC Solar has learned that communicating directly to clients, even with bad
161 news, is better than hiding like SCE. ABC Solar is founder started the first
162 internet company in Japan and programs in systems that SCE deals with, namely
163 Oracle and web portals, et.al. ABC Solar is exceptionally qualified to explain to its
164 clients that SCE has computer programs that are not behaving. If SCE was
165 communicating on time per their own statement’s ABC Solar is sure that its phones
166 and emails would not be filled with failed billing complaints. This motion should be
167 welcome by SCE as solar providers already have a working relationship with their
168 clients and in ABC Solar’s case we are better at service than SCE.

169 SCE Writes: Bartz's pattern of unreasonably reactionary behavior is
170 demonstrated by his persistent and vexatious filings in the above captioned matter
171 that largely consist of unsupported ad hominem attacks against SCE, violations the
172 ex parte rules, out of proportion responses to docket office filing requirements to
173 which all parties are subject, and repeated attempts to obtain discovery about
174 customers to which he is not entitled and for which he has no customer consent or
175 authorization.

176 ABC Solar Write: FINAL ONE, as the SCE personal attacks on BARTZ and
177 ABC SOLAR breaks his heart. These are mean people and they have been bullies
178 too long. SCE please note, I am here to stay, I will advocate against your mean
179 behavior and you will heel. I learned ex parte rules. I learned the Docket office,
180 does that scare you? I will continue to discover the path to justice at the CPUC.
181 The funniest thing to me is all SCE has to do is its job so ABC Solar clients don't get
182 past my staff and land on my desk. I do invite the CPUC Rulemaking Body to
183 arrange as witnesses my ABC Solar clients that have been negatively impacted by
184 SCE errant computer program and the coverup that happened.

185 SCE Writes: In addition to his conduct before the Commission, his behavior toward
186 SCE employees has been so inappropriate that SCE notified its corporate security officers that
187 Bartz may be a safety and security risk and requires employees to be accompanied by corporate
188 security for any in-person interactions with Bartz.

189 ABC Solar Answers: Please ask SCE to stop this bully tactic and other abusive behavior
190 towards ABC Solar and Bartz. I am a pacifist to be even associated with physical violence is a

191 deal breaker. SCE has tried this “BARTZ IS A MENACE TO SOCIETY” from day one of
192 advocating for solar. It is a boring meme that has no basis in fact or reality.

193 Finally, I did write the wrong law reference in referring to CPUC 1759(a). I
194 meant to showcase BPC 17605(a) which gives SCE an exemption from negative-
195 option-billing. I am only writing for my reference and this paragraph is not part of
196 the response to SCE as it introduces “new” stuff. But, I will always highlight
197 customer protections over monopoly greed every time.

198 Please grant this motion.

199 ABC Solar prays for success of this motion for the benefit of ratepayers
200 and the rationalization of business customer support operations.

201 Respectfully Submitted on March 31, 2021 from Rancho Palos Verdes,
202 California.

203 Sincerely yours,

204

205 /s/ Bradley L. Bartz

206 By Bradley L. Bartz

207

208 Bradley Lawrence Bartz

209 President of,

210 ABC Solar Incorporated

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215 CCL# 914346

216

217 Signed: Bradley L. Bartz / Bradley L. Bartz (Electronic)