

COPY



# GUAM POWER AUTHORITY

ATURIDÁT ILEKTRESEDÁT GUAHAN  
P.O. BOX 2977 HAGATNA, GUAM U.S.A. 96932-2977

September 17, 2008

Harry Boertzel, Esq. ALJ  
Guam Public Utilities Commission  
Suite 207, GCIC Building  
Hagatna, GU 96932



Subject: GPA Response on GCG report  
Implementation of a "Net Metering"

Dear Mr. Boertzel:

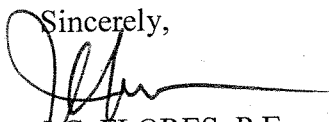
GPA has completed review of the GCG Staff Report on Net Metering and provides the following comments:

1. GPA recommends that net metering be limited to customers with usage no greater than 25 kW in accordance with Public Law 27-132. This will allow the use of existing 4-jaw and 5-jaw analog meters which are capable of turning in both directions (bi-directional) and can be utilized on a Net Metering System without purchasing additional metering equipment.
2. Sheet NM-3, paragraph 5, requires customers to maintain liability Insurance. Public law 27-132 states that the utility must not require the customer to purchase additional liability insurance. This should be resolved prior to adoption of a net metering policy/standard.

Other than the two comments above, GPA is in agreement with GCG's presentation of the subject matter. The Authority realizes that the procedural details still need to be settled. Therefore, GPA recommends the PUC review this matter at the next regulatory session and provide a reasonable schedule with action items to work towards adopting Customer-Generator Agreements, interconnection standards, engineering technical evaluation procedures as well as billing processes and other administrative matters.

Thank you for the opportunity to provide input on this critical matter.

Sincerely,

  
J.C. FLORES, P.E.  
General Manager