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June 25, 2007

Michael B. Day

Via U.S. Mail and E-Mail

Energy Division
California Public Utilities Commission
Tariff Files, Room 4005
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: Protest of PV Now, CALSEIA, and ASPv to Advice Letters 3062-E/2131-E

PV Now, the California Solar Energy Industries Association (CALSEIA), and Americans for Solar Power (ASPv) (hereinafter, the Joint Solar Parties) hereby submits for filing this protest to Pacific Gas and Electric Company's (PG&E) Advice Letter 3062-E and Southern California Edison's Advice Letter 2131-E (SCE) submitted by PG&E on behalf of the Program Administrators on June 4, 2007. The Program Administrators are comprised of PG&E, SCE, and the California Center for Sustainable Energy (CCSE). Advice Letters 3062-E/2131-E (hereinafter, the "Advice Letters") were submitted in compliance with Decision No. (D.) 07-05-007 and requested three changes to the California Solar Initiative Program (CSI) Handbook which the Program Administrators suggest will reduce the rate of non-residential applications that drop-out of the program.

As further described below, the Joint Solar Parties protest the Advice Letters principally because we believe that the process involved in reaching the recommendations before the Commission was simply inadequate to ensure these recommendations will result in a reduction in the amount of drop-outs the CSI program is currently experiencing. Inadequate data and analysis concerning the scope and scale of the drop-out problem and the inadequate procedures involved in arriving at the recommendations before the Commission at this time make it difficult to ascertain whether the options proposed in the Advice Letters or other options are well targeted and likely to be effective in reducing the drop-out rate. Therefore, the Joint Solar Parties request that the Commission suspend the Advice Letters and hold a workshop or other forum to allow program stakeholders to publicly provide comments and advice on addressing the drop-out problem before the Commission acts on the Advice Letters.

A copy of this protest is being served on each of the Program Administrators concurrently via email and U.S. Mail.

I. BACKGROUND

On May 3, 2007, the Commission issued D.07-05-007 which primarily addressed the reintroduction of megawatts (MW) from applications which drop-out of the CSI program or reduce their system sizes prior to completion. In response to concerns raised by various parties since the launch of the CSI program in January 2007, D.07-05-007 directed the Program Administrators to work in conjunction with the solar industry to develop modifications to the CSI Program Handbook which would reduce the drop-out rate of applications and submit an advice letter within 30 days of the decision with the recommended changes.

Consistent with D.07-05-007, the Program Administrators developed three recommendations and asked for feedback from the solar industry on the recommendations prior to submitting them to the Commission on June 4, 2007 via the Advice Letters. Solar industry stakeholders were able to provide informal responses on the recommendations and appreciate the opportunity to do so.

As proposed in the Advice Letters, the three recommendations would be contained in a new section of the CSI Program Handbook, Section 4.8. The first two recommendations would only apply to non-residential applications (defined as those projects with a system size ≥ 10 kilowatts (kW)); while the last recommendation would only apply to applications from non-residential commercial applications (with a system size ≥ 10 kW).

II. PROTEST

The Joint Solar Parties are encouraged to see the Commission and Program Administrators taking steps to reduce the level of drop-outs in the CSI Program. As we explained in our April 23 comments the proposed decision leading to D.07-05-007, a high level of drop-outs undermines the goals of the CSI program by pushing the California solar energy market to a lower incentive level too quickly.¹ By moving too quickly to a lower incentive level, the market is denied the stimulus resulting from solar energy systems that actually move to completion at prior incentive levels. While the reintroduction of MWs from drop-outs allowed by D.07-05-007 will reduce some of the negative impacts of drop-outs, the best and most effective method of avoiding the drop-out problem is to prevent drop-outs in the first instance.

To this end, any changes to the application process intended to discourage drop-outs must be based on a thorough understanding of both the scope and the scale of the problem in order to be effective. Unfortunately, the Program Administrators have only shared limited information with CSI stakeholders concerning the scope and scale of the drop-out problem. While the Joint Solar Parties understand certain program data is nonpublic, data such as application date, project size, category of project, reason for drop out, type of applicant (host

¹ See Americans For Solar Power Comments On Proposed Decision Of Commissioner Peevey Modifying Decision 06-08-028 Regarding CSI Incentive Adjustment Mechanism; Comments of PV Now on the Proposed Decision of President Peevey..

customer, company, power purchase agreement), date of conditional reservation, and other similar metrics can be provided in such a way as to protect confidentiality but still allow stakeholders to assess vital information concerning the drop-out problem such as whether certain types of projects are dropping out at a higher rate or whether it is a few participants contributing to a large number of drop-outs.² Such an understanding of the nature of the problem is essential to providing meaningful feedback to the Commission regarding whether the proposed recommendations will work. To date, such information has not been provided to the solar industry and, therefore, it is unclear if the changes proposed by the Program Administrators will result in lower drop-out rates or perhaps result in other unintended negative impacts on the CSI Program. Moreover, the lack of data upon which to analyze the drop-out problem resulted in the solar industry stakeholders who were able to respond to the Program Administrators' proposed recommendations with only the most general feedback.

Moreover, the process involved in arriving at the recommendations before the Commission, was flawed. The initial draft document with a proposal for addressing drop-out rates was sent to certain solar industry stakeholders by the Program Administrators on May 16th with a request for comments by May 24th. Unfortunately, the initial proposal was not sent to all of the solar industry stakeholders on the CSI service list. This resulted in the draft not being made available to CALSEIA until May 22, thereby, leaving only two days for CALSEIA to formulate a response to the proposals. The process described above when coupled with the limited amount of data available to the solar industry regarding the scope and scale of the drop-out problem severely limited the quality of the feedback the solar industry was able to provide the Program Administrators prior to their submission of the recommendations to the Commission. Simply put, the Joint Solar Parties do not feel industry stakeholders had an adequate opportunity to participate in arriving at recommendations which will address the drop-out problem and, therefore, cannot support the recommendations contained in the Advice Letters. The Joint Solar Parties also do not believe this process is what was intended in D.07-05-007. Having said this, the Joint Solar Parties recognize that the Commission provided the Program Administrators with 30 days to propose changes to the CSI Handbook designed to reduced the drop-out rate and that this compressed time schedule limited opportunities for discussion and deliberation on the causes and possible solutions to address drop out rates. The Joint Solar Parties want to make clear that we do not offer the timeline above to assess fault. We merely wish to make the Commission aware that the timeframes allowed by D.07-05-007 had unanticipated negative consequences on the ability of stakeholders to be involved in the process leading to the instant recommendations the Commission is asked to assess.

Lastly, while the Program Administrators did make changes to the proposals initially submitted to the solar industry for comments on May 16 based on the feedback received from the solar industry, the Advice Letters do not address any of the other suggestions advanced by the solar industry as possible avenues for reducing the drop-out problem. Nor do the Advice

² Confidentiality of certain data, such as installer name, could be protected by using proxies for an individual installer name. For example, Installer A, Installer B, etc.

Letters provide any explanation of why the exact recommendations before the Commission at this time were chosen versus the recommendations advanced by commenters but not accepted by the Program Administrators.³ Such a lack of transparency and analysis is particularly troubling given the general lack of information regarding the scope and scale of the drop-out problem discussed earlier in this protest. Accordingly, the Joint Solar Parties are left in the same position in which they started this process - having limited information upon which to assess the reasonableness of the measures advanced.

Given these factors, in order to effectively address the drop-out issue, the Joint Solar Parties recommend Commission suspend the Advice Letters at this time. The best way to address the drop-out issue is to hold a public workshop after key metrics on the drop-out issue are released by the Program Administrators to all CSI Program stakeholders. This venue will allow all CSI stakeholders to meet in a public forum to work collectively to address the issue based on solid data. Alternatively, if the Commission and the Program Administrators have the data and analysis available for presentation, the Solar Forum to be held on June 29, 2007 could also represent an opportunity for stakeholder input into methods for reducing drop-outs.

III. CONTACT INFORMATION FOR PROTESTANTS

Contact information for protestant, PV Now, is as follows:

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³ For example, see the attached comments presented by CALSEIA to the Program Administrators regarding Program Administrators' initial proposals. In the attached comments, CALSEIA raises concerns regarding the initial proposal and offers several counter proposals. The Advice Letters submitted to the Commission do not address any of the concerns raised by CALSEIA. Nor do the Advice Letters discuss any alternative proposals raised by CALSEIA.

Contact information for protestant, CALSEIA, is as follows:

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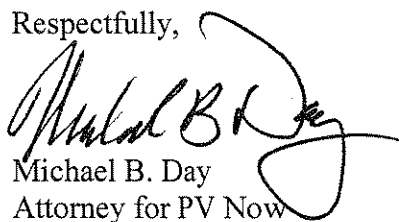
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CALSEIA and ASPv have given counsel for PV Now authorization to file this protest on their behalf.

Thank you in advance for consideration of this protest.

Respectfully,


Michael B. Day
Attorney for PV Now

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Service List – R.06-03-004

Attachment 1

CALSEIA Comments and Positions on Proposed CSI Advice Letter Regarding Drop Out
Rates

Dated May 31, 2007

3194/002/X90419.v1



CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION

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May 31, 2007
Sara Birmingham
Pacific Gas and Electric
Via email

CALSEIA Comments and Positions on Proposed CSI Advice Letter regarding Drop Out rates

CALSEIA prepared these comments after review of the Program Administrators' draft proposal for minimizing CSI Drop Outs. The draft comments were circulated by Sara Birmingham of PG&E to Ms. Julie Blunden of Sunpower Corporation. Ms. Blunden then circulated the draft comments to CALSEIA, a portion of the solar companies in the CSI, and Vote Solar.

The following information will provide specific responses to the proposed suggestions and provide alternative suggestions.

These comments are specific to the Proposed Suggestions

Suggestion # 1. Revise application fee so that it does not decline.

CALSEIA believes that this proposal will not affect drop-out rates. Mega companies with the financial resources to pay the fees will not be affected and smaller companies without the resources will be unfairly excluded from participation because of they do not have enough capital reserves to pay the higher fees.

Suggestion #2. Increase Application Fees for companies with high drop out rates.

CALSEIA believes that this program has not collected enough information on the cause of drop out rates to implement this suggestion. There could be legitimate reasons why drop outs are occurring and it would not be appropriate to assume that a company with a high drop out rate is doing something wrong and should therefore be subjected to higher application fees.

Suggestion #3. Require building permit submission for commercial/non-residential systems.

CALSEIA believes that this suggestion alone does not solve the problem. Please see suggestion 3 below detailing how this can be used in conjunction with other specific changes.

CALSEIA Alternative Comments and Suggestions

The purpose of the CSI is twofold: to deliver 3,000 MW of generation capacity and to build a sustaining solar industry:

"Public Resources Code 25780. The Legislature finds and declares both of the following: (a) it is the goal of the state to install solar energy systems with a generation capacity equivalent of 3,000 megawatts, to establish a self-sufficient solar industry in which solar energy systems are a viable mainstream option for both homes and businesses in 10 years,..."

CALSEIA has identified several problems that might be contributing to high drop out rates, for example:

1. 2006 SGIP rebate applications were included in the 2007 CSI program. The decision to include 2006 SGIP rebate applications caused a rapid decline in the rebate levels in the first three months of the CSI program. Ninety days is insufficient for the solar industry (or any other industry for that matter) to develop economies of scale that would achieve lower cost equipment (principally the PV panels but other components as well). In some cases, rebate levels have now dropped to levels that were originally projected to be reached in 4 years.
2. Rebate levels are uncertain until the reservation fee is filed. For example, a customer elects to purchase a system at \$2.20/watt but the rebate level can drop between the time the application is submitted and the deposit is made. As a result, customers cancel projects because they cannot obtain the original rebate. (this example is based on PG&E disclaimers that rebate levels cannot be guaranteed at the time of application and real, cancelled projects)

CALSEIA suggests the following the PA's file an advice letter consistent with the following actions to address drop out rates:

1. Data Transparency. CALSEIA recommends that funds from the Marketing/Outreach or Research and Development allocations be expended to perform a detailed survey of customers who dropped out of the program to quantify and assess the reasons for program drop out. The Program Administrators should promptly make this information available to the solar industry and general public. It is understandable that companies may wish to have close and frequent contact with the Program Administrators for market research, however, Program Administrators should be mindful of this and ensure that information is provided broadly to as many companies as possible.
2. Drop out rate grace period. Allow a grace period, based on historical program experience, which allows rebate levels certainty by using a conservative, estimate of the drop out rate. If the Program Administrators allow the rebates reservations to "go over" the tier for one level the next level could be adjusted to ensure that expenditures are balanced and that funding is not over-allocated. (the CPUC decision does specifically allow some discretion by Program Administrators).

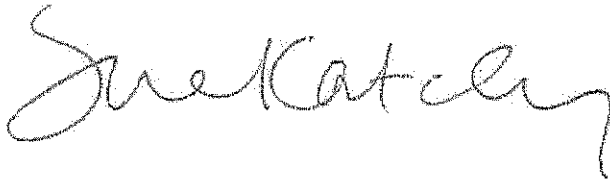
3. Require proof of projects (this recommendation should only be pursued in its entirety):
 - a. Require a signed contract up front
 - b. Application fees up front
 - c. Guarantee the rebate level upon receipt of the signed contract and application fees
 - d. Within 6 months of application, show proof that applications for construction permits have been filed with the local jurisdiction having authority.
 - e. Exempt Government, schools, not profits from this proof of permit requirement because of the length of time needed to receive all state reviews and approvals (e.g., Office of the State Architect for school projects)

4. Remove the SGIP projects from the calculations used to determine the CSI program steps. By including 2006 SGIP reservations in the 2007 CSI program the rebate levels can be restored to the levels envisioned when the CSI program was established. At the least, the SGIP projects should be removed from the calculations to determine the CSI program steps. If this is not possible, then the basis for including SGIP projects should be revisited to ensure that the intent of SB1 is being met.

5. Revisit the drop out rate situation in a public venue and consider alternative proposals. CALSEIA suggests that this review be conducted within 3 months of the filing of the advice letter. Other options have been proposed by industry worth examining, however there was insufficient time to reach consensus.

If you have any questions regarding this proposal, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Sue Kateley". The signature is written in a cursive, flowing style.

Sue Kateley
Executive Director

cc: Julie Blunden, Sunpower Corporation

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Updated 6/15/07

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