

From: Jacobson, Erik B (RegRel)  
Sent: 10/20/2010 1:39:12 PM  
To: 'Fulcher, Jack' (jack.fulcher@cpuc.ca.gov)  
Cc:  
Bcc:  
Subject: Follow-up to yesterday's affiliate rule discussion

Jack,

This is in response to your request for an idea or two to help ensure small installers are treated fairly and on par with SolarCity and SunRun. I met with a few members of our CSI team this morning to brainstorm this issue. One idea we had relates to the concern you expressed yesterday regarding the administrative cost that installers bear in filing a formal complaint at the Commission. There is currently a public meeting that occurs on a quarterly basis to discuss issues associated with the CSI program. This quarterly CSI PA Forum is hosted by each of the three PAs on a rotating basis. One thing that the Commission could consider is to require that PAs include something like "Consumer and Solar Contractor Issues" as a standing agenda item for that quarterly meeting. This would provide an opportunity for consumers and contractors to raise any concerns they might have about PA processing of applications, inspections and interconnections. PAs would then be on notice to work together with Energy Division (i.e., via the Working Group) to resolve such issues expeditiously. This quarterly forum is already set up to handle such complaints and what we are suggesting is that it be made more explicit by adding this topic to the formal agenda.

I understand that the scoping memo in this rulemaking (R.10-05-004) has yet to be issued. The ALJ could potentially include the following two issues within the scope of topics to be address at workshops or in comments during the course of the proceeding:

- Evaluate whether smaller solar contractors have adequate means to address disputes or concerns about processing of applications, inspections and interconnections by the PAs (e.g., are the quarterly CSI PA meetings the best forum for addressing such concerns?)
- Evaluate whether or not the CSI Handbook has adequate rules and protections to ensure equal treatment of all solar contractors

I also wanted to mention again that Section 3.1 of Energy Division's report on CSI program modifications (attached) deals with application processing timelines and Section 3.3 deals with the project inspections process. These two issues are on the agenda for discussion at the Monday workshop in the CSI rulemaking case. It seems like a perfect opportunity for Energy Division to raise any issues, seek comment or make suggestions regarding program modifications appropriate to address concerns that small solar contracts may have with respect to the administration of the CSI program.

I hope this helps.

Thanks,

Erik