

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues.

Rulemaking 12-11-005
(Filed November 8, 2012)

**PREHEARING CONFERENCE STATEMENT OF GRID ALTERNATIVES ON
PRIORITIZATION OF CALIFORNIA SOLAR INITIATIVE PROGRAM
MODIFICATIONS**

Stanley Greschner
Director – SASH Program
GRID Alternatives
1171 Ocean Ave, Suite 200
Oakland, CA 94608
Telephone: (510) 731-1322
Facsimile: (510) 225-2585
Email: sgreschner@gridalternatives.org

Joseph M. Karp
Winston & Strawn LLP
101 California Street, 39th Floor
San Francisco, California 94111-5894
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
Email: jkarp@winston.com
Attorneys for GRID Alternatives

March 11, 2013

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I. INTRODUCTION

GRID Alternatives is pleased to offer this Prehearing Conference Statement on the Prioritization of Program Modifications to the California Solar Initiative (CSI) Program (PHC) that were identified in the March 6, 2013, Ruling of the Assigned Administrative Law Judge. GRID Alternatives has focused its comments on the issues that directly impact the Single-family Affordable Solar Homes (SASH) Program, for which GRID Alternatives serves as Program Administrator. On all other issues, GRID agrees with the proposed prioritization.

II. GRID ALTERNATIVES'S PHC STATEMENT

A. MW Goals of SASH and MASH Solar Programs

GRID agrees that this is a HIGH priority item. The change is needed to correct a simple calculation error that occurred when the original MW target was established. This is a non-controversial issue and should be easily addressed.

B. SASH Workforce Development Benefit

GRID SUPPORTS the recommendation that this is a MEDIUM priority issue.

C. SASH Design Factor Requirement

GRID recommends REMOVING this item for consideration. This issue was discussed and satisfactorily addressed in the Decision relating to Staff Proposal Phase 1 Modifications.

D. SASH Inspections

GRID recommends REMOVING this item for consideration. This issue was discussed and satisfactorily addressed in the Decision relating to Staff Proposal Phase 1 Modifications.

E. SASH Participation for Third-Party Owned Systems

GRID recommends moving this item from MEDIUM to HIGH priority. SASH's incentive funding is quickly running out, well ahead of the program's 2015 sunset date. Incentives in PG&E's service territory are on-track to be fully reserved by late-2013. GRID believes that it worth having a discussion as soon as possible on whether or not to open the SASH Program to a third-party ownership model. Failing to have this conversation in early 2013 risks missing the opportunity to adopt program changes that could allow SASH funds to reach more families and increase the overall benefit to ratepayers.

III. CONCLUSION

GRID Alternatives appreciates the opportunity to provide these comments relating to the SASH Program and hopes that they are helpful to the Commission.

Respectfully submitted,



GRID Alternatives
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Director – SASH Program
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Oakland, CA 94608
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Email: sgreschner@gridalternatives.org

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