

**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)

**JOINT COMMENTS OF THE CALIFORNIA CENTER FOR SUSTAINABLE ENERGY,  
PACIFIC GAS AND ELECTRIC COMPANY (U39E), AND SOUTHERN CALIFORNIA  
GAS COMPANY (U904G) ON COMMISSIONER PEEVEY'S PROPOSED DECISION  
TO INCORPORATE SOLAR POOL HEATING SYSTEMS INTO THE  
CALIFORNIA SOLAR INITIATIVE – THERMAL PROGRAM**

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July 18, 2013

*Party Representatives for*  
**SOUTHERN CALIFORNIA GAS COMPANY,  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY and  
PACIFIC GAS & ELECTRIC COMPANY**

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**I.  
INTRODUCTION**

In accordance with the California Public Utilities Commission's ("Commission" or "CPUC") Rules of Practice and Procedure, Southern California Gas Company ("SoCalGas"), on behalf of the California Solar Initiative ("CSI") Thermal Program ("TP") Program Administrators ("PAs")<sup>1</sup>, submits these joint comments on the Proposed Decision of President Michael R. Peevey ("PD"), which expands the definition of a solar water heating system to include solar pool heating systems at multifamily residential, commercial, governmental, educational, and non-profit installations and allows these systems to qualify for incentives under the CSI-TP.

**II.  
DISCUSSION**

The Joint PAs commend the Commission for adopting several of the recommendations of the PAs for the incorporation of solar pool heating incentives into the CSI-TP. The PAs'

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<sup>1</sup> The commenting CSI TP PAs are Pacific Gas and Electric Company, SoCalGas, and the California Center for Sustainable Energy in the service territory of San Diego Gas & Electric Company.

proposed implementation plan<sup>2</sup> was based on solar pool heating industry stakeholder feedback and the PAs' own administration experience. The PAs believe that the PD, as written, meets the needs of the majority of the solar water heating community and will promote and encourage the installation of solar water heating systems. The PAs respectfully request two modifications to the PD, pertaining to the timing of the decision's implementation.

Ordering Paragraph 2 of the PD requires that within 30 days of the effective date of the final decision, the CSI-TP PAs (namely, Pacific Gas and Electric Company, Southern California Gas Company, and the California Center for Sustainable Energy) must jointly file a Tier 2 Advice letter to modify the CSI Thermal Handbook to incorporate the changes outlined in the decision. The PAs respectfully request that the PD be modified to require this Tier 2 Advice letter filing within 45 days of the effective date of the final decision, instead of the currently provided 30 days. In addition, the PAs respectfully request that the PD be modified to define the effective date for the CSI Thermal Handbook changes once the Advice letter is approved. The PD, as currently written, is silent on this matter. The PAs propose for CSI Thermal Handbook changes to be made effective 45 days following approval of the Tier 2 Advice letter.

Decision (D.) 13-02-018, approved February 28, 2013, made extensive modifications to the CSI-TP to provide incentives to process heat applications, solar cooling technologies, space heating technologies and systems that combine multiple applications. In addition, the Decision modified the way rebates are paid to certain systems under the program by creating a performance-based incentive ("PBI") system that will pay rebates based on actual metered energy delivered to the facility. In compliance with D.13-02-018, the CSI-TP PAs recently filed an Advice letter modifying the CSI Thermal Handbook to incorporate the modifications approved in the Decision.<sup>3</sup> That Advice letter is currently pending and the CSI-TP PAs are

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<sup>2</sup> *Joint Implementation Plan of the California Center for Sustainable Energy, Pacific Gas and Electric Company (U39E), and Southern California Gas Company (U904G) to Incorporate Solar Heating Pool Systems into the California Solar Initiative Thermal Program*, May 8, 2013.

<sup>3</sup> CCSE Advice No. 39, PG&E Advice No. 3394-G/4240-E, SCE Advice No. 2917-E, SCG Advice No. 4508, filed June 26, 2013.

