

**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)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) REPLY COMMENTS ON THE
ASSIGNED COMMISSIONER'S RULING REGARDING THE TRANSFER OF
RESPONSIBILITY FOR COLLECTING SOLAR STATISTICS FROM THE
CALIFORNIA SOLAR INITIATIVE TO THE NET ENERGY METERING
INTERCONNECTION PROCESS**

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Dated: September 16, 2013

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I. INTRODUCTION

Pacific Gas and Electric Company (PG&E) provides these reply comments in response to the *Assigned Commissioner's Ruling Regarding the Transfer of Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process* (ACR) filed on August 22, 2013. By email dated August 28, 2013 Administrative Law Judge Katherine MacDonald provided permission to PG&E and the other parties to file reply comments by no later than September 16, 2013. As such, this reply is timely filed.

As explained in more detail in PG&E's opening comments, PG&E believes that data fields should be added to the net energy metering (NEM) interconnection forms when needed for interconnection purposes only and only in a manner consistent with California privacy requirements. PG&E is concerned that many parties appear to be more interested in collecting various data points without regard for customer privacy interests or the negative impact this may have on ongoing efforts to streamline and improve the NEM application and interconnection process. In addition some parties seek utility data reporting on interconnection costs and timelines that are not currently part of the solar statistic reporting for the California Solar

Initiative (CSI) and go beyond the scope of this ACR. Those issues are already under Commission review in Rulemaking (R.) 11-09-011 and should not be considered here. PG&E addresses these points in more detail below.

II. DISCUSSION

A. Parties Raise Valid Concerns Regarding an Increase in Soft Costs

Comments submitted by Solar Energy Industries Association and The Vote Solar Initiative (SEIA/VSI) and by SolarCity Corporation (SolarCity) on the additional burden and cost of collecting new data fields corroborate PG&E's concern raised in its opening comments that the collection of additional fields could negatively impact efforts to streamline the interconnection process.^{1/}

SEIA/VSI for example, note, "The Commission should also be mindful of the impacts of including additional reporting requirements in the interconnection application on efforts to expedite the interconnection process."^{2/} PG&E agrees with this observation. To the same point, SEIA/VSI also writes, "... the Commission should be aware that data collection is not without costs."^{3/}

SolarCity is even more emphatic regarding the negative impact of the ACR proposal to add data collection fields, "the ACR's proposal appears to move in the opposite direction, increasing both the complexity and cost..."^{4/} SolarCity quantifies the cost impact by estimating, "... that the ACR requirements would add an additional \$7-\$22 per application, without including or quantifying the impact of application delays that could be caused by interconnection application modifications necessitated by equipment shortages and component swap-outs."^{5/} While PG&E has not quantified the cost impact on the utility side resulting from the additional

1/ PG&E comments, p. 6

2/ SEIA/VSI comments, p.2

3/ ibid

4/ SolarCity comments, p. 1

5/ SolarCity comments, p.4

data collection if the ACR were to be adopted, it is clear there are additional costs and it will be significant. As detailed in opening comments, PG&E believes PG&E's pending Advice Letter 4263-E^{6/} includes all the additional fields necessary for the NEM application process.

B. Additional Data Collection Should be Voluntary and Should not be Included in the NEM Interconnection Process

In response to parties' comments requesting extensive data collection beyond that proposed in the ACR, PG&E reiterates its overall recommendation that the Commission minimize the collection of data not necessary for completing the interconnection process and providing utility service to utility customers.^{7/} This is crucial both to preserve customer privacy interests and avoid delay or negative impacts to the NEM application and approval process. Fields proposed by parties that fall into this category include (by party): permitting costs (DECA^{8/}); mandatory reporting of installation costs (CalSEIA^{9/}); use of the EPBB calculator during interconnection (CalSEIA, CCSE^{10/}).

Finally, in response to Clean Coalition's comments regarding reporting on pending distributed generation interconnections in general, PG&E notes that by the time the utility receives a net energy metering (NEM) interconnection application, the project is usually far along in the project development timeline. For most NEM projects the interconnection process will be completed within thirty (30) business days following PG&E's receipt of a completed NEM interconnection application package.^{11/} Consequently, there is little value in showing "pending" NEM applications, which will unnecessarily complicate data reporting and interpretation by users. This item was considered as part of the recent update of Electric Rule 21, which specifically provides that Net Energy Metering Applicants are not assigned a queue

^{6/} http://www.pge.com/nots/rates/tariffs/tm2/pdf/ELEC_4263E.pdf

^{7/} See CPUC Privacy Rule 5 "Data Minimization," D.11-07-056, Attachment D, July 28, 2011.

^{8/} Distributed Energy Consumer Advocates

^{9/} California Solar Energy Industries Association

^{10/} California Center for Sustainable Energy

^{11/} See CA PUC section 2827 (e)(1).

position.^{12/} This exception makes sense, and this provision and other details about what project details are made public, was reviewed and approved by the Commission as part of the Rule 21 Settlement.^{13/} These issues should not be revisited here.

C. Parties Comments Address Topics that are Out of Scope

A number of parties request additional data collection well beyond what is proposed in the ACR. These include data fields related to additional dates (CalSEIA, CCSE), details about distribution feeder lines and identification of FERC jurisdictional busbars related to specific projects (DECA), as well as details about interconnection costs (DECA). As discussed above, many of these requests extend into areas already under consideration in R. 11-09-011 and have little if anything to do with the ACR goal of considering ongoing collection of California Solar initiative (CSI) related data. They are out of scope and should not be considered here. In addition, given the thousands of NEM projects interconnected each month, there would be a significant cost to compile and report such data at monthly intervals with little if any identified benefit.^{14/}

Plus, the ACR focuses specifically on NEM data collection. Therefore, fields proposed by parties that are unrelated to NEM data collection such as wholesale (Clean Coalition) or non-export interconnected distributed generation (SEIA/VoteSolar), energy efficiency participation (DRA)^{15/} are also out of scope for this ACR and should not be considered. Finally, CCSE's recommended changes to the utilities' interconnection processes^{16/} are similarly out of scope. The more appropriate venue for these topics is the Rulemaking (R.) 11-09-011, which addresses any improvements to distribution level interconnection rules and regulations, as well as the collection and reporting of Rule 21 Interconnection data.

^{12/} Rule 21 section E.5.c.

^{13/} D. 12-09-018.

^{14/} A far more cost effective means to evaluate data are the targeted Measurement & Evaluation (M&E) studies undertaken as part of the CSI program itself.

^{15/} Division of Ratepayer Advocates

^{16/} CCSE comments, p. 4

D. Certain Data is Needed to Provide for Safe Interconnection

While PG&E appreciates and supports many of SolarCity's requests to eliminate data fields from the ACR, there are some fields collected as part of the current NEM interconnection process that continue to be needed for a safe and reliable interconnection. Specifically, PG&E does not support SolarCity's comments on inverters, photovoltaic (pv) panels and capacity.^{17/} PG&E uses information provided in the NEM application on the quantity, manufacturer and model of inverters and pv panels to perform its engineering review and to calculate NEM system capacity^{18/}. The granular details are used to confirm that inverters are certified^{19/} and to determine the pv module kw output to the inverter. PG&E's interconnection engineering review has found projects using non-certified inverters that require additional review and study. In addition, inverter manufacturers have different anti-islanding schemes. So for projects installing several different inverters on a single system, again, additional study and review may be warranted. By identifying the inverter manufacturer for a system, PG&E's engineers can better determine what facilities or upgrades are required for safe and reliable operation of the grid.

E. PG&E Supports Providing a Smooth Transition for the Collection of Additional Data Fields

In its opening comments, Southern Californai Edison Company (SCE) requests that the transition to collecting CSI Data Fields on NEM Interconnection Applications be completed as soon as practical^{20/}, and PG&E agrees. To better understand the needs of the NEM community, PG&E sought input from solar installers on how to improve the NEM application process. This resulted in PG&E's Advice Letter 4263-E, which was filed on July 31, 2013, received no protests, and would achieve the following goals by: (i) enhancing the customer's experience by making the requisite forms easier to read and fill out, (ii) increasing PG&E's processing efficiency and shortening cycle times so the customer can be online sooner, (iii) facilitating the

^{17/} SolarCity comments, pp.7-8

^{18/} The PV module details are used to calculate the CEG-AC rating, which is used for the NEM cap.

^{19/} UL 1741

^{20/} SCE comments, p. 6

collection of equipment information after actual generator construction in order to improve asset registry data quality, and (iv) eliminating the request for insurance information. PG&E requests that the issues discussed in the ACR not delay the approval of the much needed process improvements included in Advice Letter 4263-E. If required in the future, PG&E can again update its forms to address any new data collection requirements.

III. CONCLUSION

PG&E respectfully requests that the Commission modify the ACR as discussed above and in PG&E's opening comments, and act promptly to approve PG&E's Advice Letter 4263-E.

Respectfully submitted,

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