

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)

**THE DIVISION OF RATEPAYER ADVOCATES' REPLY COMMENTS ON  
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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## I. INTRODUCTION

Pursuant to the August 22, 2013 “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” (Ruling), the Division of Ratepayer Advocates (DRA) submits these reply comments. Eleven parties (including DRA) filed opening comments: Southern California Edison Company (SCE), California Center for Sustainable Energy (CCSE), Solar Energy Industries Alliance and Vote Solar Initiative (SEIA/VSI), San Diego Gas & Electric Company (SDG&E), California Solar Energy Industries Alliance, Distributed Energy Consumer Advocates, Pacific Gas & Electric Company (PG&E), SolarCity Corporation, Clean Coalition, and Sierra Club. In these reply comments DRA explains the following points:

- Streamlining the investor owned utilities’ (IOU) distribution interconnection processes and additional reporting requirements, where justified, need not be mutually exclusive.
- Data privacy should be protected; the Commission should distinguish between the need to track certain data that is important for policy purposes but may not be necessary for the provision of service, and publishing data in a way that would not violate the Commission’s privacy rules.
- Net energy metering (NEM) interconnection costs are recovered from all ratepayers; at minimum, the Commission and ratepayers need to understand the magnitude of customer-side distributed generation (DG) costs, as well as the benefits of customer-side DG systems.

## II. DISCUSSION

### A. **Streamlining the IOUs’ distribution interconnection processes and additional reporting requirements, where justified, are not mutually exclusive.**

PG&E, SolarCity Corporation, CCSE and SEIA/VSI emphasize the need to continue streamlining the interconnection process, which DRA supports.<sup>1</sup> DRA staff actively participate

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<sup>1</sup> Pacific Gas & Electric Company’s 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, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K843/76843233.PDF> (“PG&E opening comments”), pp. 6-7; Opening Comments of SolarCity Corporation on the Assigned Commissioner’s

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in the Rule 21/Distribution Interconnection rulemaking (R.11-09-011), and advocates for Rule 21 revisions that would further the Commission’s objective of ensuring the process is timely, non-discriminatory, cost-effective, and transparent.<sup>2</sup> Streamlining the NEM interconnection process is one important factor for achieving the 12 gigawatt (GW) goal outlined in the Governor’s Clean Energy Jobs Plan in a time- and cost-efficient manner. It is unclear how requiring NEM customers / interconnection applicants to provide a few additional items of information through the interconnection process would impose a significant incremental burden beyond what is already reported under the CSI program. SolarCity Corporation claims that increasing its reporting requirements through the NEM interconnection form(s) will raise its ‘soft costs’ by a range of \$7 to \$22 per application.<sup>3</sup> While SolarCity Corporation explains that the wide range of this estimate is based on the number of times a customer record would need to be opened or the number of departments that would need to be involved, it provides no further substantiation of this cost estimate. Further and more generally, it is not entirely clear from the perspective of an installer how the process would differ from (and whether it would necessarily be more costly than) the processes used for handling CSI applications and associated NEM interconnection forms. DRA agrees that the Commission should weigh the benefits and costs of new reporting requirements, but to the extent parties claim such requirements will adversely affect them or their constituents, they should provide substantial evidence supporting such claims.

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Ruling, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K764/76764830.PDF> (“SolarCity Corporation opening comments”), pp. 2-5; Comments of the California Center for Sustainable Energy regarding 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, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K843/76843235.PDF>, pp. 4-5; and Comments of the Solar Energy Industries Association and the Vote Solar Initiative Regarding the Transfer of Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K386/76386623.PDF>, pp. 2-3; all filed September 9, 2013.

<sup>2</sup> See, e.g., R.11-09-011 The Division of Ratepayer Advocates’ Comments on Distribution System Interconnection Rules, filed October 27, 2011. Available at <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/CM/147012.PDF>,

<sup>3</sup> SolarCity Corporation opening comments, p. 4

The IOUs also raise concerns regarding whether they will be able to recover incremental costs associated with the transfer of data collection from CSI to NEM interconnection.<sup>4</sup> DRA is not necessarily opposed to these requests, but recommends that further details regarding potential incremental costs be included in the record. As DRA acknowledged in its opening comments, some amount of incremental costs may be required for the IOUs to reconfigure their systems in order to implement the Commission’s decision, but currently there is insufficient detail on the record as to how the actual transition would occur. DRA therefore recommends that the Commission, in its decision on this matter, direct the IOUs to make their transition plans transparent to parties and subject to modification by Commission staff, with the express objective of minimizing the cost of any necessary system reconfigurations, enhancements, etc.

**B. Data privacy should be protected.**

All three IOUs emphasize the need to protect customer privacy.<sup>5</sup> DRA agrees and has advocated strongly in R.08-12-009 for protecting customer privacy. If necessary and helpful, the Commission should consider adding a fourth column to its table (of additional items to collect through the NEM interconnection forms), to identify data items that should be collected but not transmitted to the CSS administrator. Such data that the Commission deems worth tracking, but not publishing, should only be available to Commission staff, or to parties conducting discovery under specific nondisclosure.

**C. It is appropriate to include information that is necessary for policy purposes in the scope of data collection through the NEM interconnection processes, while maintaining customer privacy.**

PG&E and SDG&E suggest that the scope of information to be collected should be limited to “providing services as required by state or federal law or specifically authorized by an

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<sup>4</sup> PG&E opening comments, p. 7; Comments of the Southern California Edison Company 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, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K764/76764832.PDF> (“SCE opening comments”), p. 5; and Opening Comments of San Diego Gas & Electric Company 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, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M076/K841/76841400.PDF> (“SDG&E opening comments”), p. 4.

<sup>5</sup> PG&E opening comments, pp. 3-6; SDG&E opening comments, pp. 2-3; and SCE opening comments, pp. 3-5.

order of the Commission, or in support of specific energy programs that serve a ‘primary purpose;’”<sup>6</sup> if instead the Commission extends the scope of data collection to information that serves ‘secondary purposes,’ then SDG&E argues that the Commission “must adequately and clearly provide the underlying purpose of all proposed data fields, and explain how the process will ensure full compliance with all privacy laws regarding collection, storage, use or disclosure of covered Solar Statistics.”<sup>7</sup> DRA agrees with SDG&E on this point, as evidenced by the explanations in DRA’s opening comments for the additional data items that DRA recommends collecting. It is important to collect such data in order to ensure the Commission will have a sufficiently robust dataset for establishing policies that fairly balance the interests of participating and non-participating ratepayers. For instance, the IOUs are prohibited by both statute and Commission decision from assessing certain interconnection-related charges on NEM customers, and therefore they recover these costs through rates assessed on all ratepayers.<sup>8</sup> By Commission decision, the IOUs are also required to accommodate distributed generation (DG) in their distribution planning processes, specifically in terms of providing information regarding the circumstances under which DG could provide distribution capacity benefits.<sup>9</sup> At minimum, the Commission and ratepayers need to understand the magnitude of customer-side DG interconnection costs, as well as the benefits, of customer-side DG systems. The Commission should balance the need to protect customer privacy with the need for information regarding the costs and benefits of customer-side DG.

### III. CONCLUSION

DRA supports ongoing efforts to streamline the distribution interconnection process, and the need to protect customer privacy while ensuring that the Commission will have adequate and reliable information on which to fairly balance the interests of participating and non-participant ratepayers in its customer-side DG policy decisions.

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<sup>6</sup> SDG&E opening comments, p. 3; and PG&E opening comments, p. 5.

<sup>7</sup> SDG&E opening comments, p.3.

<sup>8</sup> Public Utilities Code §2827(g) and Decision (D.) 02-03-057, Ordering Paragraph 2. See also Rule 21 tariffs: [http://www.pge.com/tariffs/tm2/pdf/ELEC\\_RULES\\_21.pdf](http://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_21.pdf), Sheets 43, 44, 48, 61, 64; [http://regarchive.sdge.com/tm2/pdf/ELEC\\_ELEC-RULES\\_ERULE21.pdf](http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-RULES_ERULE21.pdf), Sheets 21, 26, 27, 29, 37, 39; and [https://www.sce.com/NR/sc3/tm2/pdf/Rule21\\_1.pdf](https://www.sce.com/NR/sc3/tm2/pdf/Rule21_1.pdf), Sheets 30, 37, 38, 41, 51, 53.

<sup>9</sup> D.03-02-068, Ordering Paragraphs 1 and 3.

Respectfully submitted,

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