



June 23, 2014

Advice No. 48
(California Center for Sustainable Energy)

Advice No. 4447-E
(Pacific Gas and Electric Company –U 39 M)

Advice No. 3063-E
(Southern California Edison Company – U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Modifications to California Solar Initiative (CSI) Program Handbook to include more detailed and comprehensive low-income eligibility documentation standards for the Multifamily Affordable Solar Housing (MASH) Program and remove language discussing MASH Track 2 incentives and process.

PURPOSE

The California Center for Sustainable Energy (CCSE), on behalf of the MASH Program Administrators (PAs),¹ hereby submits this advice filing to propose modifications to the CSI Program Handbook to include more detailed and comprehensive low-income eligibility documentation standards for the MASH Program, including a cover sheet summarizing key details of Public Utilities Code Section 2852 low income documentation, and to remove language discussing MASH Track 2 incentives and process.

BACKGROUND

On March 7, 2014, the Energy Division served the MASH PAs with a data request regarding the low-income eligibility documentation filed by applicants in the MASH Program for completed projects and those still active in the application process. The low-income eligibility documentation, referred to as “Public Utilities Code Section 2852

¹ The MASH PAs are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and CCSE in the service territory of San Diego Gas & Electric Company (SDG&E).

Documentation”, are legal instruments that denote a voluntary restriction on the use of the multifamily residential housing property. This restriction commits the property owner to provide at least 20% of the units at that site to affordable housing at that location. Having such a property restriction in place and filed with a public entity or nonprofit housing provider is a prerequisite for receiving a MASH incentive.

After reviewing the responses received from the MASH PAs, a letter dated April 23, 2014 from Edward Randolph, Director of the Energy Division, was sent to the MASH PAs and directed the PAs to submit an Advice Letter within two months to add more detailed and comprehensive low-income eligibility documentation standards for the MASH Program to the CSI Program Handbook. Specifically, the letter noted that the standards should enumerate the various types of acceptable documentation according to the MASH program eligibility pathways codified in Public Utilities Code Section 2852.

In compliance with this direction, the MASH PAs hereby submit this advice filing to propose modifications to the CSI Program Handbook to include more detailed and comprehensive low-income eligibility documentation standards for the MASH Program. These revisions would apply prospectively to projects that do not have the reservation confirmations as of the filing date of this Advice Letter. Related to these modifications, the MASH PAs also seek to add requirements for a cover sheet summarizing key details of the Public Utilities Code Section 2852 documentation. The cover sheet will allow the PAs to more accurately and efficiently determine eligibility of projects.

Lastly, the MASH Track 2 incentive was closed in 2011 as per Commission Decision (D.) 11-07-031. As such, language in the CSI Program Handbook that discusses Track 2 incentives and process is no longer needed. Accordingly, the MASH PAs propose modifications to the CSI Program Handbook to remove any language discussing MASH Track 2 incentives and process.

PROPOSED AMENDMENTS TO THE CSI PROGRAM HANDBOOK

The proposed revisions to the current version of the CSI Program Handbook are summarized below and included in Attachment A to this advice filing.

Proposed Amendments to the CSI Program Handbook

Addition of more detailed and comprehensive low-income eligibility documentation standards to the CSI Program Handbook

Reason: The present language in the CSI Program Handbook is inadequate and vague, providing too little guidance for MASH customers and application review staff. More detailed and comprehensive low-income eligibility documentation standards must be added to the CSI Program Handbook to ensure the integrity of the MASH program documentation review process going forward.

Affected Section(s): 2.1.5, 4.11.1.7

Removal of MASH Track 2 Incentives and Process

Reason: Because the MASH Track 2 incentive was closed in 2011 as per the Commission Decision regarding CSI Phase One Modifications (D.11-07-031), the MASH PAs agree that having language in the CSI Program Handbook that discusses Track 2 incentives and process is no longer needed.

Affected Section(s): 4.5, 4.5.2, 4.5.2.1, 4.5.2.1.1, 4.5.2.1.2, 4.5.2.1.2, 4.5.2.1.3, 4.5.2.2, 4.5.2.2.1, 4.5.2.2.2, 4.5.2.2.3, 4.5.2.3, Table 17 (All Deleted)

Addition of requirement for MASH applicants to include cover sheet summarizing key details for Public Utilities Code Section 2852 documentation

Reason: In order to clearly outline how a proposed MASH project achieves Public Utilities Code Section 2852 eligibility, Applicants are required to submit a cover sheet summarizing key details. This will allow the MASH PAs to more accurately and efficiently determine eligibility of projects.

Affected Section(s): 4.5.1.1, Table 16, 4.11.1.8 (New)

Addition of the term “if applicable” to Printout of EPBB Tool Calculation in list of required documentation in the Reservation Request Package

Reason: In some cases, a printout of the EPBB Tool Calculation is needed to show the percentage allocation by building (for master metered properties).

Affected Section(s): 4.5.1.1

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

PROTESTS

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than July 13, 2014, which is twenty (20) days after the filing of this Advice Letter. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, CA 94102
Facsimile: (415) 703-2200
Email: EDTariffUnit@cpuc.ca.gov

Copies of the protest should also be sent to the attention of the Director, Energy Division, Room 4004, at the address shown above.

A copy of the protest should also be sent via e-mail and U.S. mail to CCSE at the address shown below on the same date it is mailed or delivered to the Commission:

For CCSE:

Sachu Constantine
Director of Policy
California Center for Sustainable Energy
9325 Sky Park Court, Suite 100
San Diego, California 92123
E-mail: sachu.constantine@energycenter.org

For PG&E:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
E-mail: PGETariffs@pge.com

For SCE:

Megan Scott-Kakures
Vice President of Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030

San Francisco, California 94102
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There are no restrictions as to who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

EFFECTIVE DATE

CCSE requests that this Advice Letter become effective on regular notice, July 23, 2014, which is thirty (30) calendar days after the date of filing.

NOTICE

CCSE is providing a copy of this Advice Letter to service list R.12-11-005.

A handwritten signature in black ink, appearing to read "Sachu Constantine". The signature is stylized and cursive.

Sachu Constantine
Director of Policy
California Center for Sustainable Energy

Attachments:

Attachment A – Redline California Solar Initiative (CSI) Program Handbook illustrating proposed revisions

cc: Service List R.12-11-005