

**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)

**OPENING COMMENTS OF  
RENEWABLE ENERGY PARTNERS, LLC  
ON ALJ RULING**

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**July 22, 2014**

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Pursuant to the ruling dated July 2, 2014, Renewable Energy Partners, Inc. (REP) offers these comments concerning the Staff Proposal in implementing AB 217 in the above-captioned proceeding.

**I. Statewide Program Administrator - Attachment A # 8**

REP opposes the proposed idea of consolidating the Program Administrator responsibilities to a non-partial entity as part of an effort to standardize process and reduce administrative costs. REP recommends to the Commission that great efforts be put forth to ensure AB 217 is implemented prior to January 1, 2015 as AB 217 anticipates. The timing of launching AB 217 is vital to many financial aspects of the related solar projects including cost and availability of materials, available financing and potential loss of federal tax incentives. Thus, REP recommends that the Commission consider transitioning the Program Administrator responsibilities from the participating utility companies to the new Program Administrator after the first twenty-four (24) months of AB 217 have been completed and to be fully transitioned by January 1 2017. This approach would allow enough time for a smooth transition without unnecessary delays

associated with RFP's, vendor selection, staffing, training and program set-up and implementation related to the start-up of the new Program Administrator for the new MASH Program.

It is vital that the Commission ensure that all participating utility companies utilize the same process and eligibility documentation for MASH. It is our opinion that the IOUs have already been adequately trained on MASH administration and that if standardization of process can be attained then the need for a statewide administrator would be greatly reduced.

## **II. Waitlist Reconciliation – Attachment A # 10**

REP supports the Staff's recommendation that all waitlisted projects for the MASH Program associated with AB 217 that were confirmed on the collective waitlists of the three IOUs as of April 10, 2014 provided that all applicants be required to meet all requirements imposed on the program by AB 217. The applicants should be required to amend their previously submitted applications within 45 days once they are notified by their respective Program Administrator that their application is ready for review under the new program rules and eligibility requirements. The Commission should clarify the process for which the IOUs will qualify their respective waitlists. All three of the participating IOUs will use the same standard to manage their waitlists. All non-conforming applications should then be cancelled if a conforming application is not received within the specified time to resubmit an application for the new rules approved for AB 217.

All legitimate applications previously received for the MASH Waitlist should be eligible for the AB 217 incentives including projects that have previously been permitted or built. These property owners made the investments to allow enhanced property value and allow access to

solar for their low income tenants. By excluding already constructed projects limits the related benefits that can be shared with the tenants and it is inconsistent with the existing CSI Handbook.

### **III. Incentive Policy Relating to Tenant Benefits**

REP supports the recommendation to share a percentage of incentives with on-site tenants provided the property owner has the flexibility of how those benefits are transferred to the tenants. Greater clarity is required for the property owner to have a full understanding of the terms and conditions associated with the amount and related time frame to transfer those benefits.

### **IV. Conclusion**

REP recommends that Staff make its best efforts to expedite the rulemaking and approval of the implementation of AB 217. While the transition of Program Administration to a “central administrator” may have some financial merit long term, it should be weighed against any significant delays associated with such a transition.

Respectfully submitted,

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