



August 18, 2014

Advice No. 50-A
(Center for Sustainable Energy™)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: **Supplemental Filing:** Proposed Amendments to the California Solar Initiative Program Handbook to Better Align Program Eligibility Requirements with NEM Aggregation pursuant to a Utility NEM Tariff and Make Other Necessary Updates

PURPOSE

The Center for Sustainable Energy™ (CSE), formerly known as the California Center for Sustainable Energy (CCSE), hereby submits this supplemental advice filing to provide additional clarification regarding proposed amendments to the California Solar Initiative (CSI) Program Handbook to better align CSI Program Eligibility Requirements with NEM Aggregation pursuant to a utility NEM tariff. This supplemental advice filing therefore supplements, but does not replace in its entirety, the original Advice Letter, CSE Advice Letter 50, filed on July 29, 2014. All proposed revisions other than those specifically discussed herein remain as proposed initially in CSE Advice Letter 50 and in the redlined version of the CSI Program Handbook included as Attachment A to this supplemental advice filing.

BACKGROUND

As previously noted in CSE Advice Letter 50, existing language in the CSI Program Handbook creates confusion and limitations for projects participating concurrently in the CSI Program and NEM Aggregation pursuant to a utility NEM tariff. Thus, on July 29, 2014, CSE filed CSE Advice Letter 50 to propose revisions to the CSI Program Handbook to make necessary modifications to specific subsections in the Program and Definitions Sections of the current CSI Program Handbook to better align CSI Program Eligibility Requirements with NEM Aggregation pursuant to a utility NEM tariff, including: (1) the addition of supplemental language to the existing definition of "Site"; (2) the inclusion

Center for Sustainable Energy
9325 Sky Park Court, Suite 100 San Diego, 92123 · Phone: 858.244.1177 · Fax: 858.244.1178
www.energycenter.org

of a new definition for “Contiguous Site”; and (3) the expansion of the eligibility language in Section 2.2.4, “Equipment Must Serve On-Site Electrical Load”. Collectively, these modifications will allow CSI Program Eligibility Requirements to be in line with, and in support of, NEM Aggregation pursuant to a utility NEM tariff.

After filing Advice Letter 50, CSE collaborated with the other CSI Program Administrators (PAs), PG&E and SCE, to subsequently determine that additional clarification is needed regarding the proposed modifications to specific subsections in the Program and Definitions Sections of the current CSI Program Handbook to better align CSI Program Eligibility Requirements with NEM Aggregation pursuant to a utility NEM tariff. Specifically, rather than refer to “the NEMA tariffs”, as previously proposed in CSE Advice Letter 50, we hereby change the term to “NEM Aggregation pursuant to a utility NEM tariff” to better capture that the arrangement is not a tariff itself, but a condition of the NEM tariff. Further clarification in the “Acronyms” section of the Handbook is proposed to provide complete clarification of the terms used to describe Meter Aggregation. Additionally, the PAs determined that there is a need to limit retroactive application of these revised CSI Program Eligibility Requirements. Thus, we hereby clarify that eligibility for applicants participating concurrently in the CSI Program and NEM Aggregation for an incentive based on the aggregated system will be based on current Reservation status in the CSI Program, and that all reservation awards will be dependent upon the respective utility’s available incentive funding.

PROPOSED AMENDMENTS TO THE CSI PROGRAM HANDBOOK

This supplemental advice filing seeks to provide additional clarification regarding proposed amendments to the CSI Program Handbook to better align CSI Program Eligibility Requirements with NEM Aggregation pursuant to a utility NEM tariff. The additional clarification provided solely affects the CSI Program Handbook sections listed below. All proposed revisions other than those specifically discussed herein remain as proposed initially in CSE Advice Letter 50 and in the redlined version of the CSI Program Handbook included as Attachment A to this supplemental advice filing.

Sections:	1.9	Acronyms
	2.1.5.1	Eligibility for Applicants Participating Concurrently in the CSI Program and NEM Aggregation (Note: new section added)
	2.2.4	Equipment Must Serve On-Site Electrical Load
	Appendix A	Definitions, “Contiguous Site”
	Appendix A	Definitions, “Site”

Additional clarifications are summarized below:

Addition of two Acronyms to provide clarification of all terms relating to the topic of Meter Aggregation

Reason: By including two additional acronyms, *NEM* and *NEMA*, in the Acronyms Section of the CSI Program Handbook, we seek to provide complete clarity and avoid confusion about the two similar, but inherently separate, terms.

Affected Section(s): Section 1.9

Clarify that eligibility for applicants participating concurrently in the CSI Program and NEM Aggregation for an incentive based on the aggregated system will be based on current Reservation status in the CSI Program

Reason: During recent discussions, the PAs determined that there is a need to limit retroactive application of these revised CSI Program Eligibility Requirements. Thus, eligibility for applicants participating concurrently in the CSI Program and NEM Aggregation for an incentive based on the aggregated system will be based on current Reservation status in the CSI Program. Therefore, any application that has not yet reached *Reservation Reserved* status¹ will have the option to revise his/her reservation to reflect the aggregated system, except where limited by the respective utility territory's available incentive funding. The PAs reserve the right to request new CSI Program documentation and/or application fee(s) if the reservation is changed from the original submission. Furthermore, multiple solar electric systems that have multiple reservations in the CSI Program queue that have already reached *Confirmed* status, and/or any status prior to *Confirmed*² but not further,³ and are re-designed to form a single generating solar electric system that offsets aggregated loads and participates in NEM Aggregation may opt to combine the reservations into a single application, not to exceed the sum of the originally Reserved dollar amount(s). All reservation awards will be dependent upon the respective utility's available incentive funding.

Affected Section(s): Section 2.1.5.1 (new section)

¹ Statuses prior to *Reservation Reserved* may include *Reservation Request Review*; *Suspended Reservation Request Review*; *Pending RFP*.

² Statuses prior to *Confirmed* may include *Reservation Request Review*; *Suspended Reservation Request Review*; *Pending RFP*; *Reservation Reserved*.

³ Applicants are not eligible to revise the application to reflect an aggregated system or receive an incentive for an aggregated system if under any of the following statuses: *Incentive Claim Request Review*; *Suspended Incentive Claim Request Review*; *Pending Payment*; *PBI-In Payment*; or *Completed*. These statuses indicate that the final incentive amount has been reserved, and the system has already been interconnected with the Utility.

Change reference from “the NEMA tariffs” to “NEM Aggregation pursuant to a utility NEM tariff”

Reason: After recent discussions with the other CSI PAs, we determined that the term “NEM Aggregation pursuant to a utility NEM tariff” better captures that the arrangement is not a tariff itself, but a condition of the NEM tariff.

Affected Section(s): Section 1.9, Section 2.1.5.1 (new section), Section 2.2.4, Appendix A

TIER DESIGNATION

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

PROTESTS

CSE respectfully requests an expedited protest period for this Supplemental Advice Letter. Anyone wishing to protest this Supplemental 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 August 28, 2014, which is ten (10) days after the filing of this Supplemental 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 CSE at the address shown below on the same date it is mailed or delivered to the Commission:

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

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

CSE requests that this Supplemental Advice Letter become effective on September 8, 2014, which is twenty (20) calendar days after the date of filing.

NOTICE

CSE is providing a copy of this Supplemental 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
Center for Sustainable Energy™

Attachments:

Attachment A – CSI Program Handbook Revisions (Redline Version)

cc: Service List R.12-11-005