

August 18, 2014

Edward Randolph, Director
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

Re: Advice 50 (Center for Sustainable Energy™) -- Proposed Amendments to the California Solar Initiative Program Handbook to Better Align Program Eligibility Requirements with the NEMA Tariffs and Make Other Necessary Updates

Dear Mr. Randolph:

By way of this letter, the Solar Energy Industries Association (SEIA)¹ and the California Solar Energy Industries Association (CALSEIA) respond to the above referenced Advice Filing of the Center for Sustainable Energy™ (CSE) regarding amendments to the California Solar Initiative (CSI) Program Handbook in order to better align specific provisions of the Handbook with the Investor Owned Utilities' (IOUs) Commission-approved Net Energy Metering (NEM) Aggregation tariffs as well as the underlying statutes.

In particular, SEIA and CALSEIA support CSE's proposed changes to Section 2.2.4 of the Handbook (in conjunction with proposed modification to the definition of "Site") to allow projects participating in NEM Aggregation to receive their CSI incentive based on the aggregated load of multiple benefiting accounts under a NEM Aggregation arrangement rather than just the load directly interconnected to the generator (provided that the aggregated load does not exceed the statutory size limit for a single NEM system). These changes will ensure that customers for whom meter aggregation presents a viable path forward to deploy solar are not disadvantaged in pursuing those projects relative to other customers pursuing non-aggregated projects by virtue of inconsistent treatment in terms of CSI incentive eligibility.

As noted by CSE, this change is consistent with Public Resources Code Section 25782 which sets forth the eligibility criteria for solar energy systems receiving CSI incentives. Of particular import are subsections (a)(2) and (a)(5) which delineate the load to be offset and the

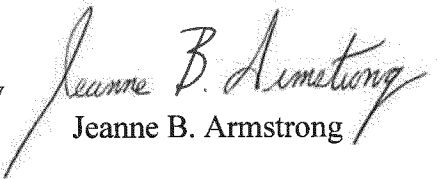
¹ The comments contained in this letter represent the position of the Solar Energy Industries Association as an organization, but not necessarily the views of any particular member with respect to any issue.

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location of the solar energy system. The former provides that the “The solar energy system is intended primarily to offset part or all of the consumer’s own electricity demands” while the latter provides that “the solar energy system is located on the same premises of the end-use consumer where the consumer’s own electricity demand is located.” Compliance with SB 594 requires that aggregated load from various meters serve the load of *one* eligible customer generator and that such meters be on property adjacent or contiguous to the property on which the generation facility is located. By providing for aggregation of load from property immediately adjacent or contiguous to the property which the generation facility is located, SB 594 effectively redefined the term “premises” for eligible customer generators participating in the NEM Aggregation program. The conforming changes to the CSI Handbook, as proposed by CSE, must be made.

SEIA and CALSEIA appreciate the opportunity to provide this response.

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