

**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 SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON
THE PROPOSED DECISION TO TRANSFER RESPONSIBILITY FOR COLLECTING
SOLAR STATISTICS FROM THE CALIFORNIA SOLAR INITIATIVE TO THE NET
ENERGY METERING INTERCONNECTION PROCESS**

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September 2, 2014

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**I.
INTRODUCTION**

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits these Opening Comments on Administrative Law Judge Timothy J. Sullivan’s August 12, 2014 Proposed Decision (“PD”) in the above-captioned proceeding, namely, the *Decision To Transfer Responsibility For Collecting Solar Statistics From The California Solar Initiative To The Net Energy Metering Interconnection Process*.

SDG&E generally supports the PD, aside from those concerns SDG&E noted in prior Comments¹ and has specific suggestions regarding the PD’s Ordering Paragraph 2:

2. Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas and Electric Company shall work together to create a single statewide Net Energy Metering interconnection interface, which may utilize the system which San Diego Gas and Electric Company is currently using in its territory.

¹ SDG&E’s September 9, 2013 Opening Comments on the *Assigned Commissioner’s Ruling (ACR) Regarding The Interconnection of Energy Storage Systems Paired with Renewable Generators Eligible for Net Energy Metering*.

SDG&E shares the Commission’s recognition of the value of an online Net Energy Metering (“NEM”) interconnection application system for NEM customers statewide. SDG&E has successfully developed and implemented a proven online NEM interconnection application interface called the Distribution Interconnection Information System (“DIIS”)², which connected all of SDG&E’s NEM customers³ to an improved NEM application experience. DIIS has a successful track record from which NEM customers statewide could benefit if DIIS were utilized by all three Investor Owned Utilities (“IOUs”). While DIIS is proprietary and has, in part, been tailored to interface with SDG&E’s unique systems, the user experience is universally applicable and the application process in DIIS was designed consistently with SDG&E’s NEM tariffs that also have strong commonality among the three IOUs. Leveraging this existing resource is an efficient use of ratepayer funds and could generate additional customer benefits in the future if it were to be procured by load-serving entities in other jurisdictions.

Specifically, since SDG&E already has a working NEM interconnection interface, estimates minimal upgrades to comply with the California Public Utilities Commission (“Commission”) orders in this PD⁴, and supports the most efficient and effective way to implement a statewide interface, SDG&E appreciates the Commission’s recommendation that the three IOUs to work collaboratively to modify DIIS for statewide use in furtherance of the Commission’s goals. SDG&E believes that modifications to a system that is already in production, versus building one anew, may enable the three IOUs to more expeditiously and more cost effectively meet the Commission’s needs. SDG&E is willing to work with the IOUs on an arrangement to implement DIIS as a statewide tool.

² U.S. Provisional Patent Application No. 61/941,415.

³ SDG&E’s online system supports all NEM technology types up to a 1000kW system size.

⁴ To collect the data set forth in the PD’s Appendix A through each utility’s NEM interconnection application.

II. BACKGROUND

In 2006, the Commission established the California Solar Initiative (“CSI”) program, which provided billions in incentives to promote the installation of solar photovoltaic (“PV”) systems in California’s Investor Owned Electric Utilities (“IOU”) service territories. Upon further legislation, the Commission modified the CSI program to be consistent with Senate Bill (“SB”) 1 and SB 585, with a total CSI budget of \$2.37 billion. The program launched in 2007, allowing customers to apply for CSI rebates through an application process that requires certain information collected through a CSI application system. The California Solar Statistics contractor downloads the data and posts the information to the California Solar Statistics website on a weekly basis. The Commission finds the data specific to the system characteristics, cost, and expected performance of customer-sited PV systems invaluable to various parties, including the Commission, Program Administrators (“PAs”), market participants, researchers, and the general public. As the CSI incentive funds are depleted, an increasing share of customer-sited renewable generation facilities will be installed without going through the CSI application process.

An Assigned Commissioner’s Ruling (“ACR”) was issued on August 22, 2013, proposing that minimum reporting requirements should be provided by the IOUs and certain fields published on the California Solar Statistics website. The ACR encouraged the IOUs to streamline and automate the collection and transfer of the data funded through the CSI program. Several parties, including SDG&E, raised concerns regarding customer confidentiality and common reporting formats⁵, however the Commission continues to require a publicly-available data set.

To address the Commission’s concerns regarding the winding down of the CSI application process, the PD orders the IOUs to update the customer NEM interconnection application requirements to include additional data fields and to regularly transfer this data to the

⁵ SDG&E’s September 9, 2013 Opening Comments on ACR Regarding *the Interconnection of Energy Storage Systems Paired with Renewable Generators Eligible for Net Energy Metering*.

California Solar Statistics contractor for processing and posting to the California Solar Statistics website. Finally, the PD orders the utilities that have not done so to establish an online NEM application process. Specifically, the PD orders SDG&E, Pacific Gas and Electric (“PG&E”), and Southern California Edison (“SCE”) to work together to create a single statewide NEM interconnection interface, which may utilize the system which SDG&E is currently using.

III.

SDG&E RECOMMENDS THE OTHER UTILITIES USE ITS ALREADY IMPLEMENTED SYSTEM TO ESTABLISH A SINGLE STATEWIDE NEM INTERCONNECTION INTERFACE

Although Pacific Gas & Electric (“PG&E”) and Southern California Edison (“SCE”) have an established NEM application process and are currently working on creating an online application system, SDG&E is the only utility that has a fully operating online NEM application process. SDG&E’s online customer application process includes a behind-the-scenes, centralized NEM tariff and interconnection screening tool for SDG&E’s internal processing use. Besides the savings benefits of utilizing an online system, SDG&E provides customers with an efficient approval process and the Commission with data in a timely manner. As SDG&E has already developed and implemented an efficient system, SDG&E agrees with the Commission’s recommendation for the other utilities to not “reinvent the wheel but to pursue existing products or packages.”⁶

IV.

DIIS IS A PROVEN SOLUTION TO MEET THE COMMISSION’S GOALS

In response to rising NEM and other distributed energy resource application volumes, SDG&E developed a solution that gives customers and contractors greater visibility into the status of their NEM applications while also giving SDG&E the tools to better manage its business. SDG&E’s objectives also included contractor and customer transparency at each milestone of the application, reduced timeframe for utility authorization, robust reporting

⁶ August 12, 2014 *Proposed Decision to Transfer Responsibility For Collecting Solar Statistics From the California Solar Initiative To The Net Energy Metering Interconnection Process* page 8.

functionality and scalability to help SDG&E manage the reliability of its distribution grid. Furthermore, the Electric Power Research Institute (“EPRI”) recently highlighted how DIIS addresses a broader market need in a June 2014 PV Integration Case Study.⁷

From 2012 to 2013, SDG&E experienced a 108% increase in the number of NEM authorizations and authorized approximately 11,000 NEM customers in 2013 alone. Despite the exponential growth of NEM applications in SDG&E’s service territory, SDG&E reduced the time to authorize NEM customers to an average of five calendar days in 2013 under its conventional application process and to an average of one business day under its unique Fast Track option.⁸ Customers electing the Fast Track process do not require an SDG&E inspection.

SDG&E commenced development of DIIS in January, 2012 and invested over 18,000 people hours (approximately 9 full-time employees) to implement it. SDG&E launched DIIS in February, 2013. SDG&E has since implemented thirteen enhancements based on its experience using DIIS to interconnect over 20,000 NEM customers to-date.

DIIS provides robust functionality to SDG&E, customers and contractors. DIIS enables contractors to manage their own business through self-service tools and monitor every application milestone within SDG&E’s control. Customers, contractors and SDG&E receive real-time updates as each application milestone is reached. Rich reporting and analytics enable SDG&E to easily disseminate the myriad of application data, for external and internal needs. DIIS helps SDG&E manage, for example, the internal workflow of its NEM inspectors, distribution analysts and the geographic information systems (“GIS”) team. In addition, SDG&E

⁷ The article has been excerpted from EPRI’s Q2 Solar Market Update report, published in June 2014 and is available to view at <https://www.sdge.com/sites/default/files/documents/1508554296/EPRI%20DIIS%20Case%20Study.pdf?nid=11826>.

⁸ NEM customers are eligible for the Fast Track Process if the system size is less than 30kW, the application is submitted 14 calendar days prior to the city/county inspection, and there are no access issues on the property. In order to apply for the Fast Track Process the NEM application must include a clear digital photo of the transformer number serving the property or pole number, and a clear digital photo of the PV warning plaque and the electric meter (in the same frame).

created a process in DIIS to monitor unauthorized generation to protect public and utility employee safety. In summation, DIIS is scalable to meet the unique needs of its users.

**V.
CONCLUSION**

SDG&E respectfully submits these comments for the Commission's consideration.

DATED at Los Angeles, California, this 2st day of September, 2014.

Respectfully submitted,

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