

**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  
(November 8, 2012)

**COMMENTS OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION AND THE  
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION  
ON 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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In accord with the Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Solar Energy Industries Association (SEIA)<sup>1</sup> and the California Solar Energy Industries Association (CALSEIA) comment on the Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative (CSI) to the Net Energy Metering (NEM) Interconnection Process, which was issued in the above captioned proceeding on August 12, 2014 (Proposed Decision or PD).

**I. INTRODUCTION**

In devising a means to transfer responsibility for collecting solar statistics from the CSI to the NEM interconnection process, the Proposed Decision correctly recognizes that:

The data collected for California Solar Statistics provide invaluable information to the Commission, the Program Administrators (PAs), market participants, researchers and the general public related to the system characteristics, cost and expected performance of customer-sited PV systems. Among other benefits, the data help utility planners understand the grid and resource impacts of these distributed generation fleets..... It is vital that these data not be lost as the CSI program winds down.<sup>2</sup>

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<sup>1</sup> The comments contained in this filing represent the position of the Solar Energy Industries Association as an organization, but not necessarily the views of any particular member.

<sup>2</sup> Proposed Decision, p. 3.

SEIA and CALSEIA strongly agree with the PD’s assessment of the importance of the data collection and its continuity as the CSI program comes to a close. To this end, SEIA and CALSEIA recommend that the PD be modified to assure that data on projects installed during the transition period between the cessation of CSI applications and the new data collection paradigm ordered by the PD is not lost. That said, SEIA and CALSEIA are cognizant that data collection is not without cost to the consumer -- a cost that will no longer be offset through receipt of the CSI incentive. Accordingly, SEIA and CALSEIA request that the Commission take into consideration proposals that will mitigate the overall cost to the consumer, such as the one offered below.

## **II. COMMENTS**

### **A. The PD Should Be Modified to Ensure Continuity of Data Collection**

Absent clarification, the process specified in the Proposed Decision for the future collection of solar statistics may result in certain of that data being unreported. As noted in the PD, “[a]s CSI incentive budgets are depleted, the PAs will reach a point, or have already reached the point, where they cease accepting CSI applications.”<sup>3</sup> The fact is that the PAs have already or soon will reach the point where they are not accepting CSI applications. Accordingly, for those customers currently interconnecting outside the CSI process there is no automatic data collection as is currently in place for the CSI applications.<sup>4</sup> Absent specific instruction from the Commission to the IOUs, the data from solar interconnections that occur between the cessation of an IOU’s receipt of CSI applications and the time when the data collection mechanism ordered by the PD is effected will be lost. In order to assure continuity in the data, the

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<sup>3</sup> *Id.*, p. 3.

<sup>4</sup> The CSI program employs Power Clerk, the online application system for the CSI program, for data collection purposes.

Commission should direct the IOUs, until such time as the data collection mechanism ordered by this decision becomes effective, to separately provide to the California Solar Statistics contractor data from NEM interconnection applications submitted outside the CSI application process. This should include “backfilling” data on interconnections that have already occurred since the cessation of accepting CSI applications for those utilities that have ceased accepting CSI applications for certain customer classes. Utilities should be required to submit data on past installations that are not in the CSI database within 30 days of the final decision and to update that data every 30 days thereafter until the new data collection mechanism is in use.

The data fields submitted should be comparable to those currently collected by the Power Clerk system to the extent such information is collected as part of the current NEM interconnection application(s). For cost and feasibility reasons, it is not reasonable to require solar project developers or customers to collect and submit data on past installations that was not collected at the time of submitting the NEM interconnection application, and it certainly would be unacceptable to penalize solar developers or customers for not having collected such information. However, the information that has been submitted on those applications by the IOUs is readily available to the IOUs and should be uploaded into the statewide public database.

**B. The PD Should Be Modified to Mitigate Costs of Additional Data Reporting**

While SEIA and CALSEIA certainly support continued data collection, the benefits of which are manifold, we believe it is important to ensure that the costs of submitting data are manageable. As the solar industry is transitioning to a post-incentive world, it must be cognizant of each additional cost in order to ensure that solar installation remains cost-effective for the consumer. Some of the proposed data fields are more relevant to interconnection than others. In the absence of a CSI incentive or other mechanism for recovery of costs associated with data

reporting, it is appropriate that only those costs associated with data reporting that can be meaningfully justified should be imposed on an industry that is working hard to reduce the costs of deploying solar.

The PD requires the reporting of several new data fields (as specified in Appendix A to the PD), some of which are material to interconnection and some of which are not.<sup>5</sup> SEIA and CALSEIA recommend that as a means of further mitigating the additional reporting cost associated with the new data fields, the PD be clarified to provide that submitting updates when information changes is only required when the updated information bears on the interconnection application. If an interconnection application is submitted with accurate information on the system at that time and there is a change to that information that does not require a change to the NEM interconnection application, then the customer or installer should not be under an obligation to provide the updated data to the IOU.

### **C. The PD Should Be Modified to Clarify the System Cost Data Field**

The PD notes that system cost may be difficult to ascertain in the case of third party-owned systems and proposes to use the “Federal Investment Tax Credit (ITC) filed amount” for such systems. This appears to mean the “claimed Federal ITC cost basis in the PV System” because the ITC pursuant to section 48 of the Internal Revenue Code is equal to 30% of the taxpayer’s cost basis in ITC-eligible assets. SEIA and CALSEIA request clarification that this is the value to be reported in the system cost field for third-party owned systems and appropriate modification to the system cost field.

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<sup>5</sup> The following are examples of data fields reliant on system design: Capacity in DC watts and AC watts (CEC-AC and CSI Rating); Number of inverters; Mounting (rooftop/ground/mixed); Tracking (fixed/single-axis/dual-axis/mixed).

### III. CONCLUSION

SEIA and CALSEIA submit that the Proposed Decision be expeditiously approved, with the minor modifications set forth above.

Respectfully submitted this September 2, 2014 San Francisco, California.

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