

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)

**Comments of the Center for Sustainable Energy regarding the Proposed
Decision to Transfer Responsibility for Collecting Solar Statistics from the
California Solar Initiative to the Net Energy Metering Interconnection Process**

Center for Sustainable Energy

September 2, 2014

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I. INTRODUCTION

The Center for Sustainable Energy (CSE), formerly known as the California Center for Sustainable Energy (CCSE), appreciates the opportunity to provide comments regarding the *Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process* (Proposed Decision). CSE provides the following comments regarding the Proposed Decision:

- The collection of comprehensive and accurate installation and performance data is vital for California Solar Statistics (CSS) to remain the invaluable resource it has become for a variety of users.
 - Data collected should include not only data for net energy metered (NEM) solar energy systems but data for all interconnected distributed generation (DG) systems.
 - “Lost” data should be retroactively collected from utility interconnection records to ensure CSS remains a fully comprehensive resource.
 - The data fields proposed to be collected and published should be sufficient with two exceptions.
 - Verification of data collected will be crucial to ensure data integrity and usefulness of the data.
- The Decision should clarify that a single statewide online NEM interconnection application portal shall be established, not three separate online application processes, and should clarify whether any unification of the NEM interconnection interfaces additionally extends to the utilities’ back-end databases.

- The Decision should clearly state that funds from the CSI Program Administrators' (PAs') Measurement and Evaluation (M&E) budgets shall support activities to establish the single statewide online NEM interconnection application portal.

II. THE COLLECTION OF COMPREHENSIVE AND ACCURATE INSTALLATION AND PERFORMANCE DATA IS VITAL FOR CSS TO REMAIN THE INVALUABLE RESOURCE IT HAS BECOME FOR A VARIETY OF USERS.

A. Data collected should include not only data for NEM solar energy systems but data for all interconnected DG systems.

CSE understands that the Proposed Decision applies only to customer-sited NEM interconnection applications for DG solar, but because not all DG solar systems utilize NEM, we recommend that the Commission also extend the direction to the utilities to collect the data fields provided in Appendix A (with the additional fields suggested below) through the utilities' Rule 21 non-export interconnection application. This will allow for capture of data for all interconnected DG solar systems, not just that of those utilizing NEM. Nevertheless, we are pleased to see the Commission's forward-thinking and strong urging to the utilities to "implement a technology platform that can later be modified to be used for the broader universe of interconnection applications, including but not limited to exporting generation, standalone storage, storage paired with generation, and wholesale customers."¹

B. "Lost" data should be retroactively collected from utility interconnection records to ensure CSS remains a fully comprehensive resource.

In the Proposed Decision, the Commission acknowledges that "[a]s CSI incentive budgets are depleted, the PAs will reach a point, or have already reached the point,

¹ *Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process* (Proposed Decision), August 12, 2014, page 8, footnote 7.

where they cease accepting CSI applications, [and i]t is *vital that these data not be lost as the CSI program winds down.*² However, the Proposed Decision fails to address a plan to retroactively collect these “lost” data from utility interconnection records. CSE urges the Commission to outline specific actions to be taken by the utilities to retroactively collect any “lost” data and furthermore, to permit the utilities to utilize CSI M&E funds to support these actions. Retroactively collecting the “lost” data is vital to ensure that a complete, continuous collection of system installation data is maintained and posted to CSS, allowing for more comprehensive and fully transparent insight into the market.

C. The data fields proposed to be collected and published should be sufficient with two exceptions.

CSE is generally pleased with the data fields to be provided by customers and by utilities and those to be published on CSS, as listed in Table 1 of Appendix A. We find this list generally includes the data fields necessary to provide robust installation and performance data useful to a variety of users, including regulators, developers, installers, consumers, researchers, and policymakers. We are especially pleased to see the Commission require the utilities to integrate the Expected Performance Based Buydown (EPBB) calculator into their online NEM application process. The collection of data from pre- and post-installation siting, including tilt, azimuth, shade and mounting method, will ensure the practices to which contractors became accustomed in the CSI Program continue to be fostered and utilized for the purposes of better system design, grid management and consumer awareness and education. Moreover, requiring the use of the EPBB calculator will help ensure data integrity, due to the use of drop-down menus that allow for consistent and accurate provision of data. CSE is also pleased to see the Commission’s requirement to collect and post to CSS the

² Proposed Decision at 3, *emphasis added*.

Contractors State Licensing Board (CSLB) number; however, we would recommend that the type of CSLB license also be collected and posted to CSS.

Regrettably, the Commission has elected to not require the submission of third-party contracts, citing that host customers and third-party owners who do not wish to share detailed financial information may object.³ CSE believes third-party contract data is necessary to provide fully transparent and comprehensive system cost data on CSS. CSE therefore urges the Commission to require the following fields be collected and posted to CSS for third-party contracts: (1) the cost of the modules; (2) the cost of the inverters; (3) permitting costs; and (4) balance of system costs. In addition to requiring the collection and posting of these fields to CSS, we strongly urge the Commission to require the upload of the third-party lease or Power Purchase Agreements (PPAs), as well as host customer- owned installation contracts, so that the utilities may verify the data provided, for the reasons discussed in detail below.

D. Verification of data collected will be crucial to ensure data integrity and usefulness of the data.

In the Proposed Decision, the Commission declines to require that the utilities validate data, citing that the utilities “will object to the significant extra work and cost involved in reviewing contracts.”⁴ CSE feels this is not a valid reason for not requiring verification of the data collected. We strongly urge the Commission to determine ways to ensure that the data collected and posted to CSS is verified and therefore accurate and useful to industry stakeholders. Verified and accurate data available via CSS is crucial, not just to provide a complete and accurate picture of the solar market to industry stakeholders, but also to provide consumer protection by allowing consumers to compare contractors and their average cost per watt for system installations with

³ Proposed Decision at 10.

⁴ Proposed Decision at 10.

confidence in the posted results. All users of CSS, including regulators, developers, installers, consumers, researchers and policymakers, have come to rely on accurate information posted on CSS, and verification of the data should be a required part of the interconnection process.

III. THE DECISION SHOULD CLARIFY THAT A SINGLE STATEWIDE ONLINE NEM INTERCONNECTION APPLICATION PORTAL SHALL BE ESTABLISHED, NOT THREE SEPARATE ONLINE APPLICATION PROCESSES, AND SHOULD CLARIFY WHETHER ANY UNIFICATION OF THE NEM INTERCONNECTION INTERFACES ADDITIONALLY EXTENDS TO THE UTILITIES' BACK-END DATABASES.

The Proposed Decision directs Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) to establish an online application process and states that San Diego Gas & Electric (SDG&E), which has already set up and is operating an online NEM application process, may propose enhancements to its system pursuant to the process set out in the decision should it wish to enhance its system.⁵ Presumably, these directives seek to establish the single statewide online NEM interconnection application portal that will ultimately be required by the decision, although this is not necessarily clear in the Proposed Decision. We respectfully request that the Commission clarify that these directives are to be completed in the establishment of the single statewide online NEM interconnection application portal and not in the establishment of three separate online application processes. Streamlining the utilities' NEM interconnection application processes and making them consistent across the service territories via the establishment of a single statewide online NEM interconnection application portal will greatly minimize costs and allow the post-CSI data collection process to be as timely as the present process through CSI.

Furthermore, we strongly support the Commission's "urg[ing] SCE and PG&E not to reinvent the wheel but to pursue existing products or packages," especially seeing "[a]s

⁵ Proposed Decision at 8.

SDG&E has already developed and implemented such a system.”⁶ Again, presuming that these directives seek to establish a single statewide online NEM interconnection application portal, we encourage the utilities to consider SDG&E’s existing customer-facing system as a model for the statewide system, but we encourage the utilities to explore other existing products or packages that could be developed for use on a statewide scale and quickly implemented as well to determine the best model for the statewide system. With respect to additional enhancements to the expanded system, we recommend that the Commission permit enhancements only where reasonable, cost-effective, and proposed and approved through a process set out by the Commission. By exploring all existing products or packages that could be developed for use on a statewide scale and quickly implemented, the utilities will be able to expeditiously establish the single statewide online NEM interconnection application portal while determining the best model for the statewide system, and any costs incurred by the utilities will be kept to a minimum.

Lastly, we note that Ordering Paragraph (OP) 2 directs PG&E, SCE, and SDG&E to “work together to create a single statewide [NEM] interconnection interface,”⁷ while OP 5 then directs PG&E, SCE, and SDG&E to “place into service an online application and additional appropriate behind-the-scenes tools”.⁸ It is unclear whether the required unification applies only to the NEM interconnection interface or if it applies additionally to the utilities’ back-end databases. CSE notes that a unified back-end database would be ideal, but should not necessarily be required, and we respectfully request clarification from the Commission on this issue.

⁶ Proposed Decision at 8.

⁷ Proposed Decision at 24, OP 2.

⁸ Proposed Decision at 25, OP 5.

IV. THE DECISION SHOULD CLEARLY STATE THAT FUNDS FROM THE CSI PAs' M&E BUDGETS SHALL SUPPORT ACTIVITIES TO ESTABLISH THE SINGLE STATEWIDE ONLINE NEM INTERCONNECTION APPLICATION PORTAL.

OP 3 of the Proposed Decision provides that CSI program administration funds shall be used to establish the online NEM interconnection application portal, while Footnote 8 of the Proposed Decision indicates more specifically that “funds [are] now available in the CSI PAs' [M&E] budgets that could support this additional activity.”⁹ We remind the Commission that the CSI PAs' *program administration* budgets are a subcategory of the CSI PAs' *administrative* budgets, i.e., the administrative budgets consist of: (1) the program administration budgets; and (2) the M&E budgets. This distinction is important as program administration funds are particularly limited at this late stage of the CSI Program and thus should not be used to support these activities. Rather, CSE recommends that the decision clearly state that only the CSI PAs' M&E budgets shall be used to support activities to establish the statewide online NEM interconnection application portal. Footnote 8 indicates that these budgets consist of nearly \$2 million, and CSE agrees with the Commission's assessment that this amount “should be well in excess of what is needed to comply with this decision.”¹⁰

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⁹ Proposed Decision at 9, footnote 8.

¹⁰ Proposed Decision at 9, footnote 8.

V. CONCLUSION

CSE very much appreciates the opportunity to provide these comments regarding the Proposed Decision.

September 2, 2014

A handwritten signature in black ink, appearing to read "Sachu Constantine". The signature is stylized and cursive.

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