

**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.

U 39 E

Rulemaking 12-11-005  
(Filed November 8, 2012)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) REPLY COMMENTS 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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**I. INTRODUCTION**

Pacific Gas and Electric Company (PG&E) provides these reply comments on the *Proposed Decision To Transfer Responsibility For Collecting Solar Statistics From The California Solar Initiative To The Net Energy Metering Interconnection Process* (PD), issued on August 12, 2014.<sup>1/</sup>

**II. DISCUSSION**

**A. The Commission Should Reject The SDG&E and CSE Proposals For A Single Uniform NEM Interface, As Well As The Proposal To Require Advance Commission Approval Of Every Portal Improvement**

PG&E strongly disagrees with SDG&E and CSE proposals requiring all utilities to adopt SDG&E's NEM portal, including all of its back-end systems.<sup>2/</sup> SDG&E argues that modifications to its system will be less costly than deploying each individual web portal. As stated in the PG&E's opening comments, PG&E has already heavily invested in its own web

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<sup>1/</sup> These reply comments address the opening comments of the Center for Sustainable Energy (CSE), the Solar Industries Ass'n and California Solar Energy Industries Ass'n (SEIA/CalSEIA), San Diego Gas & Electric Company (SDG&E), Southern California Edison (SCE), and SolarCity Corp. (SolarCity).

<sup>2/</sup> SDG&E brief pp. 1-5; CSE brief pp. 5-6.

portal, which is nearing completion and deployment in the fourth quarter of this year. Requiring PG&E to adopt SDG&E's portal would likely cause all of this work to be completely jettisoned. Requiring the use of a completely different system that requires extensive modification and testing to interface with our existing systems is unreasonable. Indeed, no one has completed the work to evaluate how much it would cost to modify the inconsistent back-end systems into a single interface; we are aware of no basis for SDG&E's claim that the single interface would save ratepayers money.

Additionally, while PG&E appreciates that SDG&E's interface may meet SDG&E's needs, the circumstances for each utility are different. Examples of these differences are service territory (PG&E's and SCE's are much larger than SDG&E's), interconnection application volumes, and internal back-end systems (i.e. interconnection processing, asset registry, customer billing, etc.). To order the adoption of one utility's system without analyzing the impacts and assessing each utility's needs would be premature and ill advised.

As PG&E suggested in its opening comments, it is appropriate for each utility to develop and deploy web portals of their choosing (since they are almost complete) and allow for a sharing of ideas and best practices through 2015. Moreover, even if a single front-end system can be developed, to include the utilities' back-end systems in this decision would be unreasonable, since each utility has extensive back-end systems beyond just handling interconnection data that the web portals interact with. For this reason, PG&E's opening comments suggested that exploration of designing the requirements of interaction with back-end systems could go through 2016, with development and deployment of a single portal possibly occurring in 2017. However, it is highly improper both procedurally and factually to make such a determination now, based on no record, no evidence, or even any real analysis.

CSE also proposes that the Commission prohibit interconnection application system enhancements unless they first receive Commission approval.<sup>3/</sup> It is simply wrong to prohibit

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<sup>3/</sup> CSE brief p. 6.

innovation and system improvements, and CSE offers no reasoning to support its request. On many occasions, improvements to the front or back-end systems can save money and time for customers, vendors, and utilities. PG&E strongly recommends that the Commission reject CSE's request to prohibit enhancements to NEM application tools.

**B. New Data Fields Should Only Be Collected From Prospective Interconnection Applications, Not Projects Already Interconnected or That Have Already Submitted Complete Applications**

In opening comments, CSE argued that utilities need to collect all data fields for all NEM projects since the CSI was adopted, including projects already interconnected after CSI applications ceased.<sup>4/</sup> Other parties which addressed the issue all argued that any new rules should be prospective only.<sup>5/</sup> PG&E agrees with SolarCity's assessment that retroactively acquiring data for generating facilities that have already applied for interconnection is burdensome and should not be a part of the final decision adopted here.

It is not reasonable to expect customers or solar installers to pull this information together and supply it to the utilities when it was not previously needed for interconnection, and was not provided originally. Nor does CSE explain the consequences if the data it wants collected is not supplied. The Commission must clarify whether the utilities are directed to refuse to interconnect customers who do not supply the requested data, (if their interconnection application was complete months ago) and whether the utility should disconnect projects that are already operating if the data listed in the PD is not supplied. If disconnection is ordered for failure to submit information, the Commission should direct how long customers have to submit this data before they are disconnected.

SEIA/CalSEIA ask that the utilities "backfill" the available data which they have been collecting through the current application processes. PG&E has no objection to this proposal, so

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<sup>4/</sup> CSE brief pp. 2-3. Note that PG&E's CSI Residential program stopped accepting new applications on May 2, 2013, and its CSI Non-Residential program stopped accepting new applications on the Waitlist after December 12, 2013.

<sup>5/</sup> SCE brief p. A-2; SEIA/CalSEIA brief p. 3; SolarCity brief p. 8.

long as it has reasonable time to assemble this data. However it is vital to not require that data be requested from customers who have already applied for interconnection, since this will cause undue burden on both the interconnection customer and the installer. Therefore, we agree with SEIA/CalSEIA that it would not be reasonable to require the collection of data on any application that was submitted prior to new application forms having been designed and approved by the CPUC.

With regards to the submittal of updated information, the decision should remain consistent with the definition of Interconnection Request in Section C of Rule 21:

Interconnection Request: An Applicant's request to interconnect a new Generating Facility, or to increase the capacity of, or make a Material Modification to the operating characteristics of, an existing Generating Facility that is interconnected with Distribution Provider's Distribution or Transmission System.

Therefore, only when one of the above criteria is met should the new data fields have to be filled out and submitted to the utility.

**C. Only Data On NEM Applications Should Be Collected**

CSE suggests that data should be collected for non-NEM systems that are interconnected to the distribution grid.<sup>6/</sup> This does not appear to be needed since data on technology and system size for any non-net energy metered installation is available on the Distribution Provider's Public Queue as per Rule 21. Additionally, due to the low (in relation to NEM) number of these applications, privacy would be a grave concern with regards to proprietary information regarding these generating facilities.

**D. The Commission Should Not Require NEM Customers To Upload Their Contract Documents Or Require The Utilities To Validate the Data Submitted By Customers.**

CSE argues that the Commission should require all projects applying for interconnection to upload their third-party lease or power purchase agreements (PPAs), as well as all host-

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<sup>6/</sup> CSE brief p. 2.

customer owned installation contracts, so the utilities can verify the data supplied.<sup>7/</sup> The collection of contracts for utility verification is unnecessary and overly burdensome. It is one thing to collect data fields not related to the safe and reliable operation of the electric distribution grid, but it is substantially different to request that lengthy documents not related to interconnection be uploaded, stored, verified, and submitted for each interconnection request. Additionally, PG&E strongly disagrees with CSE's perspective on data verification. CSE's brief does not address the cost and challenges associated with verification of installed generation sites; such a requirement would, in effect, require a re-inspection of values for fields like azimuth and tilt which have absolutely no bearing on the interconnection process. With PG&E's current volume approaching 40,000 NEM applicants per year, it would be unreasonable to require data verification of that magnitude. For these reasons, PG&E agrees with SCE's support of the PD's finding that the additional data fields should not be validated. However, if the CPUC wants the costs of PPAs and leases to be tracked, it could require the NEM applicants to submit data fields with their applications, showing first year pricing, any upfront payment, lease or PPA escalation rate, and contract duration.

#### **E. Substitution Of Inverters Should Be Reported To The Utility**

SolarCity asks that customers or vendors be able to replace or substitute inverters without informing the utility.<sup>8/</sup> Inverter size and operating characteristics do have an impact on the safe and reliable operation of the grid and as such any change in installed equipment should be reported to the utility through an interconnection request for a Material Modification (per Rule 21) to the installed system.

### **III. CONCLUSION**

PG&E requests that the Commission modify the PD as discussed in opening comments and above.

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<sup>7/</sup> CSE brief p. 4.

<sup>8/</sup> SolarCity brief pp. 4-5.

Respectfully submitted,

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