

**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)

**REPLY 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 8, 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 Reply Comments to respond to parties’ September 2, 2014 Opening Comments regarding 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*.

Five other parties filed opening comments, including Pacific Gas & Electric (“PG&E”), Southern California Edison (“SCE”), the Center for Sustainable Energy (“CSE”), the Solar Energy Industries Association and California Solar Energy Industries Association (“SEIA/CALSEIA”), and SolarCity. SDG&E responds to certain issues raised by other parties.

PG&E and SCE raised concerns in Opening Comments regarding the use of a statewide online Net Energy Metering (“NEM”) interconnection application system. Specifically, PG&E does not believe it is appropriate, or within the scope of this proceeding, to require the adoption of a uniform NEM application portal for all utilities at this time¹. SCE believes a single

¹ PG&E’s September 2, 2014 Opening Comments on the Proposed Decision, page 6.

statewide portal is unnecessary, unduly burdensome, costly, complex, and will provide little to no benefit for customers or other stakeholders.² As previously stated, SDG&E shares the Commission's recognition of the value of an online system, has successfully developed and implemented a proven online NEM interconnection application interface³, and believes that modifications to a system that is already in production, versus building one anew, may enable the three Investor Owned Utilities ("IOUs") to more expeditiously and more cost effectively meet the Commission's objective. SDG&E is willing to work with the IOUs to explore the possibility of implementing DIIS as a statewide tool.

PG&E and SCE did raise valid points in opening comments regarding needed clarification on how to treat blank data fields in customers' applications⁴. SDG&E agrees and requests that the Commission clarify whether it is voluntary or mandatory that NEM applicants are to report the listed information, and if mandatory, the deadlines and penalties for failure to comply. It is SDG&E's position that the burden of providing all such data falls on the entity or individual submitting the application. SDG&E has no position as to whether the provision of the requested data be made mandatory or voluntary, but requests the Commission provide clear direction for each new data field to enable efficient processing of a customer's NEM application. If the Commission's directive is that these data are required to be provided by the developer or customer during the interconnection application process, SDG&E requests the Commission clarify whether the IOUs should treat the NEM application as incomplete until such a time the contractor or customer provides the required data consistent with the IOU's respective NEM application process.

In Opening Comments, SEIA/CALSEIA request that the decision ensure that data on projects installed during the transition period between the close of CSI applications and the new

² SCE's September 2, 2014 Opening Comments on the Proposed Decision, page 2.

³ Distribution Interconnection Information System ("DIIS") U.S. Provisional Patent Application No. 61/941,415.

⁴ PG&E's and SCE's September 2, 2014 Opening Comments on the Proposed Decision, pages 2-3 and page 3 respectively.

data collection paradigm ordered by the PD are not lost.⁵ SEIA/CALSEIA recommend that the IOUs separately provide to the California Solar Statistics contractor data from NEM interconnection applications submitted outside the CSI application process, include “backfilling” data on interconnections that have already occurred. SEIA/CALSEIA argue that 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.⁶ SDG&E urges the Commission to reject SEIA/CALSEIA’s request to shift the burden of collecting retroactive data from solar developers and customers, to the IOUs. SEIA/CALSEIA propose shifting the burden of data provisioning from the sources most likely to possess and be able to more efficiently provide the data to the IOUs, which would necessarily be required to gather the data from the contractor or customer anyway, thus resulting in a less expeditious, more onerous and costly outcome.

As the proposed decision states, the contractor or customer installer, who applies for CSI rebates, has provided certain information during the application process⁷. SDG&E believes that the entity submitting the NEM interconnection application has the best, and often exclusive, knowledge of the data ordered in Appendix A. The Commission rightly recognizes the inherent efficiencies of collecting such data during the interconnection application process. Further to this point, SDG&E has developed its interconnection system and processes in such a way whereby the data, if provided by the contractor or customer during the NEM interconnection application process, could easily be collected and disseminated by the IOU. SolarCity’s position in Opening Comments is that for existing systems, developers should not be required to go back and update fields beyond those that have practical or technical impacts on how a system interacts with the utilities’ distribution system⁸. SDG&E agrees with SolarCity’s position insofar as the

⁵ SEIA/CALSEIA’s September 2, 2014 Opening Comments on the Proposed Decision, page 2.

⁶ SEIA/CALSEIA’s September 2, 2014 Opening Comments on the Proposed Decision, page 2-3.

⁷ 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 20.

⁸ SolarCity’s September 2, 2014 Opening Comments on the Proposed Decision, page 2, 8.

IOUs, too, are not required to retroactively collect data for systems that have already been given permission to operate by the respective IOUs. In the past eighteen months, approximately 9,000 NEM customers have indicated to SDG&E through their online application process that they did not take CSI funding. It would be impossible for SDG&E to retroactively collect all of the requisite data, especially when a customer may not choose to respond or may no longer have knowledge of the requisite data. A retroactive data collection requirement placed on SDG&E would create an unnecessary, costly, and unduly burdensome exception process outside of SDG&E's NEM interconnection application.

II. CONCLUSION

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

DATED at Los Angeles, California, this 8th day of September, 2014.

Respectfully submitted,

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