

**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)

**REPLY COMMENTS OF THE 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)¹ submits this reply to the comments which were filed in the above captioned proceeding on September 2, 2014.

I. INTRODUCTION

The Opening Comments exhibited overall support for transferring the practice of collecting solar data from the California Solar Initiative program to the net energy metering (NEM) interconnection process. Comments were thus confined to seeking certain modifications to either the particular data fields which are to be collected or the means by which the data will be made available to the public. In these comments, SEIA takes the opportunity to reply to certain of these recommendations.

II. REPLY COMMENTS

A. Missing Data Fields Should not Result Automatically in Denial of Interconnection

Both Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) seek Commission guidance on how applications with blank data fields should be treated. In contrast to SCE's reasoned suggestion that it be given discretion to accept

¹ 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.

applications with missing data fields if the fields appear inapplicable to the system at issue,² PG&E questions whether the utilities should “refuse to interconnect customers who do not supply the requested data,” and “should disconnect projects that are already operating if the data listed in the PD is not supplied.”³ While SEIA agrees that clarification is needed, the approach suggested by PG&E is unreasonable. A more measured approach is warranted.

Disconnection of projects that are already operating if the data listed in the PD is not supplied is a baseless recommendation. The applications submitted by such projects were complete at the time of submittal. Punishing such customers for failure to submit information that was not required at the time of interconnection is unjustified. With respect to projects submitting applications after approval of the PD, SEIA agrees that full completion of the application should be required. That said, as noted by SCE, there may be instances where completion of a particular field is impossible or impracticable given the type of project. In such instances the applicant should be afforded the opportunity to explain why the information is not available and the utility should accept an application in which certain data fields are incomplete if sufficient reason is given.

B. Certain Data Fields should be Modified or Eliminated

1. The EPBB Calculator Should Not be Incorporated into the NEM Application

PG&E requests that the requirement that the Expected Performance-Based Buydown (EPBB) calculator be incorporated into the NEM Application be removed.⁴ In this regard, PG&E argues that “there are other tools that could help customer’s make a more informed decision before deciding to purchase a PV system.”⁵ Similarly, SCE argues that methods other than the EPBB calculator are more effective, efficient, and less costly for estimating production

² Comments of Southern California Edison Company on the Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process, R. 12-11-005 (September 2, 2014), p.3.

³ Pacific Gas and Electric Company’s Opening Comments on the Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process, R. 12-11-005 (September 2, 2014) (PG&E Comments), p. 2.

⁴ PG&E Comments, p. 9.

⁵ *Id.*

data.⁶ Finally, as SolarCity points out, it and other solar developers have no particular reason to run the calculator without an associated incentive program.⁷ SEIA agrees that requiring solar developers to run the EPBB calculator would be a costly exercise with limited value.

The EPBB calculator was created to calculate expected performance of solar projects and establishes the CSI design factor for the use in CSI rebate applications. Once the CSI program sunsets, its primary purpose will no longer exist. While it is true that certain other information besides the CSI design factor can be derived from the calculator, there are, as the IOUs point out other sources for that information (e.g., PG&E’s solar and renewable website).

2. Third Party Contract Data Should Not be Part of the NEM Application

The Center for Sustainable Energy (CSE), arguing that “third party contract data is necessary to provide fully transparent and comprehensive system cost data”⁸, urges the Commission to add the following fields to be collected 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. While SEIA respects CSE’s desire for robust system cost data, there must be, as recognized in the PD,⁹ a balance between the collection and publication of data for the benefit and advancement of the solar market and the competitive workings of that market. This balance was recognized in the CSI data collection process which provided significant transparency without requiring the additional data fields requested by CSE as part of the application. Moreover, the additional cost information requested by CSE would add an additional layer of complexity to the application process, no doubt slowing it down, and increasing the cost associated with compiling and reporting data for the interconnection process. CSE’s request for additional data fields should be rejected.

⁶ SCE Comments , p. 9.

⁷ Opening Comments of SolarCity Corporation on the Proposed Decision to Transfer Responsibility for Collecting Solar Statistics from the California Solar Initiative to the Net Energy Metering Interconnection Process, R. 12-11-005 (September 2, 2014) (SolarCity Comments), p. 7.

⁸ 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, R. 12-11-005 (September 2, 2014), p. 4.

⁹ See PD at p. 10

3. The Application Should be Simplified for Smaller Projects

SEIA agrees with SolarCity that a simplified interconnection application for smaller systems is warranted. Specifically there is no need to collect data on tilt and azimuth for systems less than 10 kW. As highlighted by SolarCity, these systems are “overwhelmingly fixed arrays on south-facing sloped rooftops, with some predictable variation”¹⁰ Thus the information can be extrapolated to a close degree of certainty even in the absence of this data field.

4. There is no Value in the Provision of Information on the Third Party Owner

In instances where the system is third party owned, the PD would require reporting “the name of owner.” As highlighted by SolarCity, the ultimate owner of the system often is a special purpose entity created by the solar developer and a tax equity investor partner.¹¹ No benefit is gained by the reporting of the name of such entity, i.e., it serves none of the purposes for publication of the data identified by the Commission in the PD.¹² Rather the more useful information is the name of the developer associated with the third party contract. Reporting the developer’s name *does* serve the identified purpose of providing “distributed generation (DG) host customers with information about which contractors are active in their area.”¹³

Similarly, it is of no value to report the name of the REC owner if the system is third-party owned. There is no public benefit gained by knowing that the REC is owned by “X” equity fund. SEIA agrees with SolarCity that this field should be limited to an indication of whether the REC is owned by a customer or a third party.¹⁴

D. An Error in the PD Should be Corrected

The Assigned Commissioner’s Ruling which was issued in this proceeding on August 22, 2013, contained a table which listed “the relevant data fields that each utility would need to include on its NEM interconnection forms, and other data that the utility would provide.” Included in this table was the data field “Number of PV panels and panel manufacturer(s) and

¹⁰ SolarCity Comments, pp. 5-6.

¹¹ SolarCity Comments, p. 4.

¹² *See* PD, pp. 5-6

¹³ *Id.*, p. 6

¹⁴ SolarCity Comments, p. 7.

model(s).” This data field is a direct carry over from the CSI data collection. SEIA is not aware of any party which objected to inclusion of this field. The PD, at pages 13-14, contains a revised table which lists the required data fields. This table does not contain a field for “Number of PV panels and panel manufacturer(s) and model(s).” SEIA believes such omission to be in error and requests that the PD be modified to required such field on the NEM interconnection forms. This request is entirely consistent with the Commission’s expressed purposes for issuing the PD, including to “provide market suppliers (manufacturers, contractor, and investors) with information about what equipment is being installed where and for how much.”¹⁵

E. A Centralized Data Base Better Serves Data Collection Purposes

PG&E objects to the requirement in the PD that calls for a public data base to be housed with the contractor that manages the California Solar Statistics (CSS), currently Energy Solutions. PG&E suggests that the customer-specific data collected during the interconnection process will already be housed with each utility and therefore, “[i]t would be duplicative and expensive to also maintain a database at a statewide portal.”¹⁶ SEIA disagrees.

First, PG&E provides no information about the expense of a statewide portal, merely making a bald assertion that it is expensive. Second, and more important, is that PG&E’s recommendation to eliminate the statewide portal overlooks certain of the purposes of data collection and publication, as set forth in the PD,¹⁷ which are better served through a single statewide portal rather than housing the information in three different utilities (*e.g.*, providing academic researchers and journalists with vital information about the progress of the industry; informing the Commission and state government policy-makers about new technologies and market models, enabling them to intelligently modify existing programs and design future programs.)

III. CONCLUSION

SEIA submits that the Proposed Decision be expeditiously approved, with the modifications set forth above and in its Opening Comments.

¹⁵ See PD, pp. 5-6.

¹⁶ PG&E Comments, p.11.

¹⁷ See PD, pp. 5-6.

Respectfully submitted this September 8, 2014 San Francisco, California.

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