BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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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 VOTE SOLAR INITIATIVE REGARDING THE TRANSFER OF 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 August 22, 2013, Assigned Commissioner Ruling (ACR) in the above captioned docket, the Solar Energy Industries Association (SEIA)[1] and the Vote Solar Initiative (VSI) submit these comments regarding the transfer of responsibility for collecting solar statistics from the California Solar Initiative (CSI) to the net energy metering interconnection process. The ACR offers a means of resolving an issue identified in the order instituting this rulemaking, namely "the transition of data collection responsibilities from the CSI Program to utility interconnection departments once CSI Program incentives are no longer available."[2] SEIA and VSI support the process outlined in the ACR - i.e., the transfer of certain data fields from the CSI rebate applications to the net energy metering interconnection applications - as it offers a seemingly sensible transition of data collection and reporting responsibilities from the current CSI construct to the post-CSI world. This process, however, should be modified slightly to assure that all relevant data is captured, as discussed below.

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[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.

[2] Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, The Self--Generation Incentive Program and Other Distributed Generation Issues, R. 12-11-006 (November 6, 2012), p. 6.

SEIA and VSI appreciate the Assigned Commissioner's recognition 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.[3]

Indeed, SEIA and VSI submit that the data has been used by participants in the solar market to increase the competiveness of market offerings, decrease project costs and maintain a high standard of system quality - all to the benefit of California consumers.

Given the recognized value of securing certain data regarding PV system installations, SEIA is concerned that the ACR's data collection proposal, given its reliance on net energy metering interconnection applications, may be too limiting. Not all PV system installations utilize NEM. Under the ACR's proposal, data from these systems would be lost, rendering the data incomplete. Accordingly, SEIA and VSI recommend that, in addition to transferring certain data fields from the CSI rebate application to the NEM interconnection application, the same data fields be transferred to the Rule 21 Non-Export Interconnection Application. In this manner, the collection of relevant data from all comparable projects can be assured.

Despite the importance of continued data collection, the Commission should be aware that data collection is not without costs. The solar industry is transitioning to a post-incentive world and must be cognizant of each additional cost in order to ensure that solar installation remains cost-effective for the consumer. The Commission should also be mindful of the impacts of including additional reporting requirements in the interconnection application on efforts to expedite the interconnection process. Accordingly, because expanding the interconnection application process may impact the soft costs ultimately borne by solar customers, as well as the

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[3] ACR, p. 2.

timing for when interconnection applications can be submitted, SEIA and VSI would ask that the Commission carefully evaluate each informational field which the ACR proposes to add to the net energy metering interconnection application to determine whether the requested information will serve to advance a cost-effective, competitive solar industry. For example, one of the proposed data fields is "electric vehicle(s) charging on site? If so, how many EVs?"[4] This data field is not part of the CSI rebate application and it is unclear as to how the collection of such data pertains to the "system characteristics, costs and expected performance of customer-sited PV systems."

At the same time, it remains critically important to provide consumers with data and information on system costs and performance needed to make informed purchase decisions. Over time, the reported system price data has become less meaningful because of the increasing dominance of third-party owned systems. The Commission should consider inclusion of alternative pricing metrics that will allow consumers to better compare among system purchase and financing options. For similar consumer protection reasons, data fields regarding system component warranties and expected system performance should be considered. In short, undertaking an evaluation of each informational field to be added to the application will affect an essential balance between the importance of continued data collection and the avoidance of unnecessary costs.

Finally, SEIA and VSI note that, at present, the ACR provides for the data from the various fields to be compiled by each utility, and that "the data should be collected at minimum for each calendar month and transferred to Energy Solutions by the 10th, or next business day, of

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[4] *Id.*, p .5.

the following month in order to maintain access to the data on a timely basis."[5] As the Commission is aware, at present the California Solar Statistics web page is updated on a weekly basis. SEIA and VSI would recommend that this ultimately be the goal of the post CSI data collection process. SEIA and VSI recognize that the implementation of a new process may require additional time for the compilation and transfer of the data to Energy Solutions. As the utilities adapt to this new process, however, they should be able to affect a more expeditious means of compilation and transfer, allowing for the data to be updated on the website on a more timely basis.

SEIA and VSI appreciate the opportunity to comment on the proposal for the continue collection of solar installation data in a post-CSI world, and looks forward to working with the Energy Division to develop a consistent format for the data to facilitate its processing.

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[5] *Id.*

Respectfully submitted this September 9, 2013 San Francisco, California.

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