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Date of Issuance 11/13/2014

Decision 14-11-001 November 6, 2014

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)

DECISION TO TRANSFER RESPONSIBILITY FOR COLLECTING SOLAR STATISTICS FROM THE CALIFORNIA SOLAR INITIATIVE TO THE NET ENERGY METERING INTERCONNECTION PROCESS

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DECISION TO TRANSFER RESPONSIBILITY FOR COLLECTING SOLAR STATISTICS FROM THE CALIFORNIA SOLAR INITIATIVE TO THE NET ENERGY METERING INTERCONNECTION PROCESS

Summary

The California Solar Initiative (CSI) application process currently collects valuable data about customer-sited solar photovoltaic systems. As the CSI incentive funds are depleted, an increasing share of customer-sited renewable generation facilities will be installed without going through the CSI application process. This decision orders the investor-owned electric utilities to update the customer Net Energy Metering (NEM) interconnection application requirements to include additional data fields. This decision also orders the electric utilities to transfer this data to the California Solar Statistics contractor (currently Energy Solutions) on a regular basis for processing and posting to the California Solar Statistics website. Finally, it orders the utilities that have not done so to establish an online NEM application process.

1. Background

The California Public Utilities Commission (Commission) established the California Solar Initiative (CSI) in 2006, to provide \$3.2 billion in incentives and other support for solar photovoltaic (PV) systems with the goal of installing 3,000 megawatts (MW) in the service territories of California's three large investor-owned electric utilities. The Legislature codified the program, adjusted the program's scope and adjusted the Commission's portion of the total cost of the program to \$2.17 billion later that year. The Commission subsequently modified the CSI program to be consistent with Senate Bill (SB) 1, including a

limit of \$100.8 million for incentives to solar thermal technologies.¹ The program launched to the public on January 1, 2007.²

When customers apply for CSI rebates, the application requires applicants to provide certain information, including whether systems are leased or owned, the cost of systems and their components, make and model of the PV panels and inverters, whether tracking hardware is present, and the orientation of fixed-array PV panels. These data are collected by Power Clerk, the online application system for the CSI program. The California Solar Statistics contractor downloads these data and, after additional data quality control and processing, posts them to the California Solar Statistics website on a weekly basis.

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. As CSI incentive budgets are depleted, the PAs will reach a point, or have already reached the point, where they cease accepting CSI applications. It is vital that these data not be lost as the CSI program winds down.

On August 22, 2013, the assigned Commissioner issued an Assigned Commissioner's Ruling (ACR) on the topic of this decision. The ACR:

¹ See Pub. Util. Code § 2851(b).

² SB 585 added \$200 million to the incentives budget, so that the total CSI budget is now \$2.37 billion.

1. Proposed certain minimum reporting requirements, listed data that would need to be provided by the utilities, and also the fields that would be published on the California Solar Statistics website.
2. Stated the Commission's intention to require the utilities to compile these data and transfer them to the California Solar Statistics contractor for processing and posting on the California Solar Statistics website.
3. Encouraged the utilities to streamline and automate the collection and transfer of the data; and
4. Noted that funding for the data processing and publication is currently available from the CSI program.

The Sierra Club, Southern California Edison (SCE), the Office of Ratepayer Advocates (ORA),³ San Diego Gas and Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), SolarCity Corporation (SolarCity), the California Center for Sustainable Energy (CCSE), the California Solar Energy Industries Association (CALSEIA) the Solar Energy Industries Association (SEIA), Distributed Energy Consumer Advocates (DECA), and the Clean Coalition timely filed comments on September 9, 2013. On September 16, 2013, CALSEIA, SolarCity, PG&E, SCE, CCSE, and ORA timely filed reply comments. In addition to discussing which fields should be collected on the Net Energy Metering (NEM) forms and which fields should be published, parties also raised other issues, including customer confidentiality and common reporting formats.

2. Policy Issues

In both comments and replies to the ACR, parties raised a variety of issues. These comments highlighted the need to maintain customer privacy and a streamlined application process which does not create unnecessary impediments to interconnection. While the Commission understands the policy and

³ Name of the Division of Ratepayers Advocates was changed to the Office of Ratepayer Advocates.

implementation concerns shared by several parties, we feel that continuing to support a publicly-available data set is vital to the continued growth of the industry. The specific policy issues raised by parties are addressed below, by topic.

2.1. The Purpose of Publishing the Data

The investor-owned utilities (IOUs) and SolarCity raised objections to publishing certain data fields. SolarCity complains that the ACR proposes to increase both the complexity and cost of interconnection by requiring additional information which it estimates provides limited or questionable value. SolarCity asks the Commission to reconsider whether to add certain proposed data fields, including: the sale price for third-party owned systems; the name of owner at the time of sale for third-party owned systems; PACE funding if the system is customer-owned; vendor for system output monitoring; tilt and azimuth if fixed system; number of inverters and inverter manufacturer and model; number of panels, and panel manufacturer and model; capacity in Direct Current (DC) watts and in alternating current (AC) watts; and whether electric vehicles (EVs) are charging on-site and number of EVs. PG&E and SDGE argue that data not necessary for NEM or interconnection should be provided by customers on a voluntary basis. The IOUs also raise concerns regarding privacy and negatively impacting interconnection that will be addressed in greater detail below.

The Commission understands parties' concerns; however, the Commission finds that the objections to publishing certain data fields were based on a narrow understanding of the data's purpose. Rather than having a single purpose, we hold that publishing these data serves multiple goals. First, it provides market suppliers (manufacturers, contractor, and investors) with information about what equipment is being installed where and for how much. Second, it provides

distributed generation (DG) host customers with information about which contractors are active in their area and at what price. Third, it provides academic researchers and journalists with vital information about the progress of the industry. Fourth, it helps utilities to understand the nature of their DG fleet and its impact on the grid and on needed resources. And fifth, it informs the Commission and state government policy-makers about new technologies and market models, enabling them to intelligently modify existing programs and design future programs.

2.2. The Cost of Supplying Additional Data

SolarCity, SDG&E, and PG&E objected to certain fields on the basis of cost, either for the applicant or for the utility. Though no specific breakdown is provided, SolarCity estimates that these additional reporting requirements would add \$7 to \$22 per application.

Although the Commission is concerned about raising costs, we believe that the value of reporting this information significantly outweighs the incremental cost of complying with the reporting requirement, from both the utility and the applicant sides. Additionally, this represents a very small fraction of a typical solar system's cost.

2.3. NEM Application

The ACR proposed that the utility interconnection departments collect the post-CSI discussed herein via the NEM application forms that customers fill out when they apply to interconnect with the utility. No party argued against this basic approach, and we will herein adopt it.⁴ In comments to the proposed

⁴ We will note, however, that in theory, DG applicants can operate their equipment without the benefit of the NEM tariff. In practice, the vast majority of small (less than

Footnote continued on next page

decision, CSE suggested that data should be collected from all interconnection applications through the Rule 21 non-export application. We decline to do so and limit the transfer of data collection from CSI applications to NEM interconnection applications at this time.

Size and technology restrictions:

The NEM tariff is limited to DG installations of less than one MW. This decision thus does not apply to DG interconnections of greater than one MW.

The NEM tariff is available for a broad range of renewable generation technologies. The utility interconnection forms already require applicants to identify their generation technology. Because the focus of this decision is solar, and because the vast majority of NEM DG is solar, the requirements that we lay out in this decision will focus on solar DG.

Online NEM application:

Each of the three IOUs subject to this decision already has an established NEM application process. SDG&E has already set up and is operating an online NEM application process, which includes both a customer-facing online application and a behind-the-scenes, centralized NEM tariff and interconnection screening tool for SDG&E's internal use in processing NEM applications. SDG&E has found that having an online application process has provided immense savings that have quickly paid for the initial investment.⁵ In addition, DG applicants to the SDG&E grid enjoy a much speedier approval

one MW) DG host customers do sign up for the NEM tariff, and so this decision will restrict itself to NEM application requirements.

⁵ From remarks made by the SDG&E representative at a conference hosted by SDG&E on October 11, 2013, attended by representatives of SCE, PG&E, Energy Division, and ORA.

process than applicants to the other two utilities. SDG&E also reported that the tool enabled utility personnel to answer Energy Division interconnection data requests with minimal person-hours and a high degree of accuracy. In addition to these reasons, we believe that having an online application process will help ensure the accuracy of reported data and will facilitate the transfer of data to the contractor tasked with publishing interconnection data. For these reasons, we will require that SCE and PG&E work to expeditiously establish an online application process, backed up by appropriate tools for the utility's internal work flow management and decision-making, for NEM.⁶

SCE and PG&E are directed to establish memorandum accounts in their compliance advice letters to track the cost for setting up the online NEM application systems. The additional expense of integrating NEM data into the CSI Working Data Set, which will be done by the CSI contractor (Energy Solutions), shall be funded out of CSI Measurement and Evaluation (M&E) funds.⁷ We also clarify that once all IOUs have online NEM application portals, NEM applicants will no longer be able to submit paper applications.

2.4. Uniformity of NEM Processing

CCSE, CALSEIA, and Solar City all highlighted the benefits of a single, state-wide web-based application portal, potentially based on SDG&E's existing platform. Energy Division required the three Program Administrators to establish one interface/database (*i.e.* PowerClerk) in administering the CSI

⁶ *Ibid.*

⁷ For example, there are funds now available in the CSI PAs' Measurement and Evaluation budgets that could support this additional activity. These budgets now have a fund of nearly \$2 million (*see* August 2, 2013 CSI M&E Plan), which should be well in excess of what is needed to comply with this decision.

Program, which CCSE argues should be used as a model. Although we recognize that uniformity is attractive to NEM applicants who would thereby have just one interface to accustom themselves to, it is not the most cost efficient to require a single statewide NEM interconnection interface and may also slow the transfer of CSI data collection to the NEM interconnection application. In addition both SCE and PG&E have already begun developing their own online applications. In light of the fact that the three IOUs will be requiring the same data the benefit does not outweigh the increased cost or additional time needed to implement a single NEM interconnection interface. The IOUs shall transfer the data to the California Solar Statistics contractor (currently Energy Solutions) on a regular basis for processing and posting to the California Solar Statistics website. The IOUs may transfer the data on a monthly basis until the automated interface is completed for all three IOUs. Upon implementation of the automated interface, the IOUs shall transfer the data no less frequently than weekly.

2.5. Contract Submission and Data Validation

CCSE and CALSEIA requested that NEM applicants be required to submit the contracts for either the purchase of a system or for the lease or purchase power agreement, so that an IOU (or the Commission) could validate the terms for accuracy.

While a detailed review of contracts will likely ensure a more accurate database, we find that there are several reasons not to require the submission of contracts by the applicants or the validation of data by the utilities. First, it may present a deterrent to NEM participation, as host customers may object and third-party owners who do not wish to share this detailed financial information with the utility may also object. Second, the IOUs will object to the significant

extra work and cost involved in reviewing contracts. We find that these factors outweigh the advantages of requiring the submission of contracts and the validation of data, and so we will not require them.

Comments filed in response to the proposed decision asked the Commission not to require applicants to update the information provided should that information change between system design and installation. Currently, CSI applicants are required to update application information should that information change. We see no reason to alter this requirement now and will require applicants to update system information to provide accurate information.

2.6. Customer Privacy

PG&E, SDG&E, and SCE expressed reservations about the Commission's intention to continue the release of DG system data from NEM applications. SDG&E is concerned that the proposed data collection fields do not appear reasonable and necessary for the provision of utility services under the interconnection and NEM tariffs and as a result the Commission may run afoul of relevant state and federal law concerning the protection of customers' privacy. PG&E implicitly argues that this data is tantamount to customer usage data and thus should be subject to the "15/15 Rule."⁸

Customer confidentiality is an on-going concern to the Commission, to customers, and to the utilities. In the CSI Program we protect the anonymity of participants by redacting their names and street addresses in the data that is published in the Working Data Set (WDS). Furthermore, the "15/15 Rule" is not

⁸ The "15/15 Rule" is a screen that requires that any aggregated customer-confidential information provided by the utilities be made up of at least fifteen customers, and that a single customer's load be less than fifteen percent of an assigned category. This tool was established in the Direct Access Proceeding via Decision (D.) 97-10-031).

a rule but a tool that the utilities use to reach a level of aggregation that they are comfortable with. It is a tool that was deemed applicable to the Direct Access Proceeding⁹ for the limited purposes of a settlement, and it is not a general rule that is legally applicable across the board.

Second, the WDS, contains neither customer name nor address, but does indeed provide information about distributed generation installations. The fields in question are not considered confidential or private, and neither are the data that will be collected in the NEM application process.¹⁰

The IOUs also recommended that the Commission make the provision of certain kinds of data optional. However, for reasons stated earlier, we find great value in the publication of data from all NEM customers, and not only those who opt to provide this information. Therefore, all NEM applicants will be required to allow their anonymized generation system data (including Zip code and city, but redacting name and street address) to be made public in the same manner that CSI applicants have to date.

2.7. Expected Performance Based Buydown (EPBB) Calculator

In their comments, CALSEIA, and CCSE requested that the annual energy output for DG systems, as estimated by the EPBB Calculator,¹¹ be a required input on NEM applications. The EPBB Calculator is a free online tool that estimates the annual energy production for a given location, orientation, level of

⁹ D.97-10-031.

¹⁰ The Smart Grid Rulemaking addressing privacy issues deals with usage information obtained through the Advanced Metering Infrastructure – clearly, the information provided in the WDS does not fall into that category.

¹¹ The EPBB Calculator is driven by the National Renewable Energy Lab’s (NREL’s) PV Watts v.2 calculator and is available here (<http://www.csi-epbb.com/default.aspx>)

shading, roof offset, and set of equipment. These data in fact are not difficult to gather or to input. The output from running the program provides the host customer with a specific estimate of production at that location. We find that having this information will serve to protect customers against uneconomic installations by forcing system installers to clearly and explicitly state the assumptions going into the process of deciding whether or not to install a rooftop system. However, the August 22, 2013 ACR did not propose that the EPBB Calculator would be required. In comments and reply comments to this decision, parties expressed concern that use of the calculator is not free, adds additional work, and note that other tools exist to obtain similar information. In light of the fact that concerns were raised and that parties may not have had sufficient opportunity to comment on requiring the EPBB Calculator, the IOUs are not required to integrate it into the online NEM application process.

3. Data Fields to Collect and Post

NEM interconnection application forms collect some system data although the forms are not uniform across the utilities, and no utility's interconnection form includes all of the system data fields currently collected in the CSI rebate applications. The ACR proposed to establish certain minimum reporting requirements related to interconnection data, and proposed a list of fields to be collected from customers and a list of fields that would be posted to the California Solar Statistics website. All parties who submitted comments provided input on the data fields the ACR proposed to collect and the data that the ACR proposed to be posted. PG&E, SolarCity, SDG&E ask for fewer data fields, while CCSE, the Sierra Club, SEIA, and the Clean Coalition argue for different or additional data fields to be required.

The fields chosen herein are those which will assist the Commission, the utilities, researchers, property owners, and market participants to understand the characteristics of the fleet of solar DG installations. We require the submission of all data fields listed herein. A NEM interconnection application shall be considered incomplete if submitted with blank fields. The data required are prospective only and shall not be required from existing NEM customers. The following table contains our current list of requirements as defined in this Decision.

Table 1: Data fields to be provided by customers and by utilities, and those to be published.

Field	Supplied by applicant	Supplied by utility	Published on California Solar Statistics and the Working Data Set
Customer name and address	X	X	
Meter number		X	
Utility account number	X	X	
Electric tariff (prior to NEM)		X	
Customer zip, city, county	X	X	X
Name of utility		X	X
Customer sector (res/comm/ind/non-profit/educational/military/other government)	X		X
Installer name, address, email, and phone number	X		X
Participating in California rebate program? If so which program? Amount of rebate?	X		X
Date of interconnection application, date of approval by IOU		X	X
Customer-owned or third party-owned?	X		X
Sale price if host customer-owned. Claimed Federal ITC cost basis if third party-owned	X		X
If customer-owned, was it PACE financed? If so, which?	X		X
If third party-owned, then name of developer at time of sale.	X		X
If third party-owned, then contract type	X		X

(PPA/lease/pre-paid lease/other)			
Capacity in DC watts and AC watts (CEC-AC)	X		X
Number of inverters and inverter manufacturer(s) and model(s)	X		X
Number of modules, module manufacturer(s) & model(s)	X		X
Mounting (rooftop/ground/mixed)	X		X
System output monitoring? Reporting to outside vendor or only to customer? If outside vendor then name	X		X
Tracking (fixed/single-axis/dual-axis/mixed)	X		X
If fixed, then what tilt and azimuth?	X		X
EV charging on site? If so, how many EVs?	X		X
Decommissioned date (if applicable)		X	X

Interconnection departments shall not be required to get data for the new fields from customers who were connected before the new fields were required. However, the data that they have been collecting already for NEM installations shall be forwarded to Energy Solutions. We understand that as a result, the data that are published during this interim period will include the fields collected through NEM interconnection applications but not the additional data fields required as a result of this decision. Many of the fields are already included in the existing NEM application forms, or are not contentious, and thus require no discussion. Others are discussed individually below.

Customer sector:

This field currently is collected and published in the CSI database. Because this information is useful to understand how the technology is diffusing in the market, the ACR proposed and we will require a greater level of disaggregation, adding categories for industrial, educational, and military.

Rebate program participation:

Understanding the degree to which DG participants are receiving rebates will help the design of future rebate programs and also help the Commission to

better understand the economic factors that make potential distributed generators decide to participate, with and without rebate incentives.

Dates of application, approval, and decommissioning:

This information will help the Commission to monitor the responsiveness and efficiency of utility interconnection departments, and also provide information about the on-going presence, age, and vintage of DG equipment.

Cost, ownership, and financing data:

Project cost data will help the Commission and the solar DG market understand how much and how quickly the industry is lowering installed DG costs. By requesting the cost basis amount claimed on the owner's Federal Investment

Tax Credit (ITC) submission we simplify and render consistent this provision for third party owners. Project financing and if third party owned the name of the project developer will likewise inform the Commission and the market about industry trends and market concentration.

Equipment:

In comments to the ACR, SolarCity objected to the requirement to provide the exact type and number of equipment installed, explaining that this would delay installations. PG&E, however, notes that this data is important for grid reliability and safety. We will require this information, with the understanding that installers should input the equipment they expect to install, and later update the information as necessary.

System monitoring:

Because of the initial cost, most small host customer-owners in the CSI Program chose not to install monitoring equipment, even though monitoring can save the system owner money later on. We believe that system monitoring

increases the effectiveness of solar DG installations by making system owners aware of decreases and even failures in system performance. At the same time, we acknowledge that monitoring is not free, and so we will not require it. Nevertheless, we will track its prevalence and also those companies that provide the service.

Tracking information, tilt, and azimuth:

Tracking information, and tilt and azimuth for fixed orientation systems will be useful for understanding installation practices and also to improve the ability to forecast the DG fleet's performance. In the ACR comments, one objection raised the scenario of larger systems with multiple arrays facing different directions. This situation is currently dealt with in the WDS by allowing simplifying inputs, which can be adopted as well for this reporting requirement.

Energy efficiency audit and measures:

We strongly believe that energy efficiency is the most cost effective and most environmentally benign way to provide energy services. Furthermore, putting energy efficiency measures into effect before sizing rooftop generation systems will affect the kinds of systems that are built. However, our experience in the CSI has shown how difficult it is to obtain accurate, useful self-reported information of this type.¹² To obtain more useful information about energy efficiency would likely require a more detailed questionnaire that would necessarily burden applicants and interconnection departments. Therefore, we will not request information about energy efficiency measures in the NEM

¹² See the 2009 CSI Impact Evaluation Section 4.3, available here (<http://www.cpuc.ca.gov/PUC/energy/Solar/impactevaluation2009.htm>).

interconnection process.

Electric vehicle presence:

By statute,¹³ the NEM tariff is awarded only for those systems sized to the customer's historical or expected load. Customers who have recently purchased or plan to purchase EVs often request permission to operate DG systems which are bigger than their historical load would permit. Independently, we wish to monitor the impact of EVs on the grid, as well as the correlations to rooftop PV ownership, and so we will require that NEM applicants report on the presence or impending presence of EVs drawing current at the DG's premises. Because this can be useful to understand both the DG and the EV market, we will also post this information.

4. Future Modification to Reporting Requirements

In light of ongoing technological, regulatory and market developments, it is very possible that the reporting requirements laid out in this decision will need to be modified in the future. As a result, we will allow the utilities to file a Tier-2 Advice Letter, or Energy Division to issue a resolution to this effect if they believe changes should be made with respect to the fields which must be collected and the fields which must be supplied to the California Solar Statistics contractor.

5. Implementing this decision

The utilities shall file a Tier 2 Advice Letter within 60 days of the date of this decision providing NEM tariff changes. Within 60 days of the approval of those Advice Letters, the utilities' interconnection departments shall begin

¹³ Pub. Util. Code § 2827.

collecting the additional fields described here. The IOUs shall place into service the online application and additional appropriate behind-the-scenes tools within 240 days of the approval of the Advice Letters.

Development of the online NEM application portal; including but not limited to development of information technology infrastructure is required for each IOUs NEM program. Each IOU may establish a memorandum account for these expenses and may subsequently seek recovery for the reasonable costs to develop its online NEM application portal through its general rate case. Reasonable costs incurred by Energy Solutions for integrating and publishing the data shall be recovered from CSI Measurement & Evaluation (M&E) funds.

Five business days following the issuance of this decision, the CSI program administrators shall authorize Energy Solutions to begin work on integrating NEM data into the CSI Working Data Set and modifying CSS so that NEM data is published as well as CSI data.

Each IOU interconnection department shall supply Energy Solutions with the full confidential data sets (including customer name and address) to enable Energy Solutions to properly integrate the NEM data with the CSI data.

6. Comments on Proposed Decision

The proposed decision of the Commissioner in this matter was mailed on August 12, 2014 to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were timely filed on September 2, 2014, and reply comments were timely filed on September 8, 2014. The proposed decision has been modified where appropriate in response to the comments and reply comments filed.

7. Assignment of Proceeding

Michael R. Peevey is the assigned Commissioner and Katherine Kwan MacDonald, Regina DeAngelis and Jessica Hecht are the assigned Administrative law Judges in this proceeding.

Findings of Fact

1. Customers who apply for CSI rebates provide certain information, including whether the systems are leased or owned, the cost of the systems and their components, make and model of the PV panels and inverters, whether tracking hardware is present, and the orientation of the fixed-array panels.
2. The data collected for California Solar Statistics provides invaluable information to the Commission, PAs, market participants, researchers, and the general public.
3. Publishing CSI data provides market suppliers with information about what equipment is being installed where and for how much.
4. Publishing CSI data provides DG host customers with information about which contractors are active in their area and pricing information.
5. Publishing CSI data provided information about the industry to academic researchers and journalists.
6. Publishing CSI data provides information to the electric utilities about its impact on the grid, needed resources, and the nature of their DG fleet.
7. Publishing CSI data informs the Commission and state government policy makers about new technologies and market models.
8. The majority of NEM DG is solar.
9. Each IOU has an established NEM application process. SDG&E has an online NEM application process.

10. The individual IOUs currently collect certain data fields in their respective NEM applications.

11. Requiring a detailed review of the contracts for purchase or lease of a PV system is a deterrent to NEM participation when applicants do not want to share detailed financial information.

12. A detailed review of the contracts for purchase or lease of a PV system will increase the work and cost of processing NEM applications.

13. CSI protects customer anonymity by redacting names and street addresses in the data that is published in the WDS.

14. The WDS provides information about distributed generation installations.

15. Customer sector data is useful to understand how technology is diffusing in the market.

16. Rebate program participation data assists the Commission to better understand the economic factors that make distributed generators decide to participate, with and without rebate incentives.

17. The date of application, approval and decommissioning data assists the Commission in monitoring the responsiveness and efficiency of utility interconnection departments and provides information about the ongoing presence, age, and vintage of equipment.

18. Cost, ownership and financing data of PV systems assist the Commission and solar DG market to understand how much and how quickly the industry is lowering installed DG costs.

19. Requiring equipment data promotes consumer protection.

20. Data on tracking information, and tilt and azimuth for fixed orientation systems will be useful in understanding installation practices and improve the ability to forecast the DG fleet's performance.

21. Data about the presence or impending presence of EVs drawing current at the DG's premises will be useful in understanding both the DG and EV market.

Conclusions of Law

1. The data collected when customers apply for CSI rebates is invaluable and should continue to be collected and published even after the CSI program winds down.

2. The value of reporting CSI data outweighs the incremental costs that both utilities and applicants will incur complying with the reporting requirement.

3. The NEM application should be used to continue collection of the CSI data.

4. The IOUs should provide the data currently collected through the NEM application process to Energy Solutions. The requirement to collect the new data fields required by this decision should be prospective only and should not be required from customers who have submitted NEM interconnection applications prior to or within 60 days of the approval of the advice letters implementing NEM tariff changes identified in this decision.

5. Although a detailed review of contracts for the purchase or lease of a solar PV system would ensure a more accurate database the potential deterrent to NEM participation of requiring financial information coupled with the additional work and cost involved outweigh these advantages.

6. The "15/15 Rule," a tool that the utilities use to reach a certain level of data aggregation, is applicable to the Direct Access Proceeding and is not a general rule that is legally applicable across the board.

7. The data fields chosen for collection through the NEM application and publication on the California Solar Statistics Website are those which should assist the Commission, utilities, researchers, property owners, and market

participants in understanding the characteristics of the fleet of solar DG installations.

8. In light of ongoing technological, regulatory, and market developments, the utilities should be allowed to file a Tier-2 Advice Letter if they believe changes should be made with respect to the fields which must be collected in the NEM application and the fields which must be supplied to the California Solar Statistics contractor.

9. In light of ongoing technological, regulatory, and market developments, the Energy Division may issue a resolution if it believes changes should be made with respect to the fields which must be collected in the NEM application and the fields which must be supplied to the California Solar Statistics contractor.

10. The utilities should file a Tier-2 Advice Letter within 60-days of the date of this decision providing NEM tariff changes to implement the NEM tariff changes identified in this decision.

O R D E R

IT IS ORDERED that:

1. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall collect the data set forth in Appendix A through each utility's Net Energy Metering interconnection application.

2. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall provide data currently required for all applications submitted for Net Energy Metering interconnection to Energy Solutions.

3. Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas and Electric Company shall each create a Net Energy Metering interconnection interface, unless they have already done so.

4. Costs incurred by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E) in developing an online Net Energy Metering interconnection application portal may be tracked through a memorandum account. PG&E, SCE, and SDG&E may seek recovery through their respective general rate cases.

5. Costs incurred by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E) for work performed by Energy Solutions to integrate the California Solar Initiative (CSI) data and Net Energy Metering interconnection application data and for transfer and publication of that data shall be recovered through the CSI Measurement and Evaluation funds. Upon expiration of CSI, PG&E, SCE, and SDG&E may seek cost recovery through their respective general rate cases.

6. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E) shall file a Tier-2 Advice Letter within 60-days of the issuance of this decision providing Net Energy Metering tariff changes. Within 60-days of the approval of those Advice Letters, the interconnection departments of PG&E, SCE, and SDG&E shall begin collecting the additional data fields set forth in Appendix A into use.

7. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall place into service an online application and additional appropriate behind-the-scenes tools within 240 days of approval of the Advice Letters.

8. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company (collectively “the IOUs”) shall transfer the data in Appendix A on a monthly basis until the automated interface is completed for all three IOUs. Upon implementation of the automated interface, the IOUs shall transfer the data to the California Solar Statistics contractor at least weekly.

9. Within five business days of the issuance of this decision, the California Solar Initiative (CSI) Program Administrators shall authorize Energy Solutions to begin work to integrate Net Energy Metering (NEM) Data into the CSI Working Data Set and to modify the California Solar Statistics website to include publication of NEM Data. The interconnection departments of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company shall provide the full confidential data sets (including customer name and address) to Energy Solutions to allow Energy Solutions to properly integrate the NEM data with the CSI data.

10. Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas and Electric Company may file a Tier-2 Advice Letter, to request that changes should be made with respect to the fields which must be collected in the NEM interconnection process and/or those fields that must be supplied to the California Solar Statistics contractor.

11. Rulemaking 12-11-005 remains open.

This order is effective today.

Dated November 6, 2014, at Bakersfield, California.

MICHAEL R. PEEVEY

President

MICHEL PETER FLORIO

CATHERINE J. K. SANDOVAL

CARLA J. PETERMAN

MICHAEL PICKER

Commissioners

APPENDIX A

Table 1: Data fields to be provided by customers and by utilities, and those to be published.

Field	Supplied by applicant	Supplied by utility	Published on California Solar Statistics and the Working Data Set
Customer name and address	X	X	
Meter number		X	
Utility account number	X	X	
Electric tariff (prior to NEM)		X	
Customer zip, city, county	X	X	X
Name of utility		X	X
Customer sector (res/comm/ind/non-profit/educational/military/other government)	X		X
Installer name, address, email, and phone number	X		X
Participating in California rebate program? If so which program? Amount of rebate?	X		X
Date of interconnection application, date of approval by IOU		X	X
Customer-owned or third party-owned?	X		X
Sale price if host customer-owned. Claimed Federal ITC cost basis if third party-owned	X		X
If customer-owned, was it PACE financed? If so, which?	X		X
If third party-owned, then name of developer at time of sale.	X		X
If third party-owned, then contract type (PPA/lease/pre-paid lease/other)	X		X
Capacity in DC watts and AC watts (CEC-AC)	X		X
Number of inverters and inverter manufacturer(s) and model(s)	X		X
Number of modules, module manufacturer(s) & model(s)	X		X
Mounting (rooftop/ground/mixed)	X		X
System output monitoring? Reporting to outside vendor or only to customer? If outside vendor then name	X		X
Tracking (fixed/single-axis/dual-axis/mixed)	X		X
If fixed, then what tilt and azimuth?	X		X
EV charging on site? If so, how many EVs?	X		X
Decommissioned date (if applicable)		X	X

(END OF APPENDIX A)