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 06-03-004

REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE PROPOSED DECISION ESTABLISHING SINGLE-FAMILY LOW-INCOME INCENTIVE PROGRAM WITHIN THE CALIFORNIA SOLAR INITIATIVE

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November 13, 2007

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I. INTRODUCTION

In accordance with Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) respectfully submits these reply comments in response to Commission President Michael R. Peevey's Proposed Decision (PD), *Opinion Establishing Single-Family Low-Income Incentive Program Within the California Solar Initiative*, dated October 17, 2007. PG&E appreciates the opportunity to provide input and offers comments in three areas:

- PG&E agrees with Southern California Edison (SCE) that the PD should be amended to authorize cost recovery for the utilities.
- PG&E supports comments from the Joint Solar Parties and others proposing modifications to the PD to add flexibility and reduce potential barriers to participation in the California Solar Initiative (CSI) single-family low-income solar program (SFLI Program).

- The SFLI Program should be implemented statewide from the start. PG&E does not support California Center for Sustainable Energy's (CCSE's) proposal that the PD be amended to adopt a phased-in approach.

II. DISCUSSION

A. PG&E Agrees With SCE that the PD Needs Modification to Address Cost Recovery for the Investor Owned Utilities.

In its Opening Comments, SCE requests that the Commission clarify that the utilities are authorized to recover all costs associated with making incentive payments directly to qualifying applicants in their respective service territories.[1/] Regardless of what organizations serve as the SFLI Program Manager, PG&E supports SCE's request and asks that the Commission authorize recovery of the costs incurred by the utilities that are 1) attributable to the development of the SFLI Program and 2) ongoing costs, from the SFLI Program administrative budget.

B. PG&E Supports Proposed Modifications to Enhance Flexibility and Reduce Barriers to Participation in the SFLI Program.

In evaluating the PD, PG&E supports efforts to make the SFLI Program less complicated for low income participants and solar installers. PG&E is concerned that some proposed elements could potentially reduce participation among an already small pool of eligible customers. At the same time, PG&E recognizes that there are some basic principles that must be adhered to in order for the program to be a success.

In Opening Comments, CCSE asserts that setting a minimum Expected Performance Based Buydown (EPBB) Design Factor of 0.95, even independent of the geographic correction, may be a difficult standard to attain.[2/] PG&E believes that a minimum EPBB Design Factor is useful to ensure that all systems installed under the SFLI Program are responsibly designed, but agrees that some

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1/ SCE Opening Comments, pp. 9-10.

2/ CCSE Opening Comments, pp. 4-5.

adjustment may be needed. PG&E recommends that the Commission monitor the SFLI Program during the first 12 months to determine if a minimum EPBB Design Factor of 0.95 is so high that it creates a significant barrier to participation. If the Commission determines that 0.95 is too high, then the minimum EPBB Design Factor should be adjusted.

Another area that may impact the success of the program is the condition of potential participants' homes, including the suitability of their roof and electrical system to support solar installation. PG&E recommends that the Commission include monitoring of this as part of the overall program evaluation process.

PG&E agrees with the Joint Solar Parties that most, if not all, low income single family solar applicants will qualify for an exemption from the Performance Monitoring and Reporting Service (PMRS) requirement under the current cost cap requirements.[3/] However, PG&E also believes that PMRS could provide valuable performance information to low income solar customers and to the Commission for evaluating the effectiveness of this program. In Decision 07-07-028, the Commission ordered the Program Administrators to "develop a research plan to assess the metering, monitoring and reporting market."[4/] PG&E supports a temporary automatic exemption from the PMRS requirement for low-income single-family solar customers until this market research is completed, at which time the Commission should reevaluate the PMRS exemption. The Commission could also consider the possibility of including PMRS for low income single family applicants as a part of an evaluation program designed to gather data on the long term system performance and the overall effectiveness of this program.

3/ Joint Solar Parties' Opening Comments, p. 7.

4/ D.07-07-028, Ordering Paragraph 4, p. 13.

C. The Single-Family Low-Income Solar Program Should be Rolled Out Statewide.

In its Opening Comments, CCSE states "that it is reasonable to allow those responding to the RFP to address in their bid responses whether their program implementation will be phased-in or simultaneously launched statewide."[5/] As the CPUC states in the PD, one of the reasons for using a single statewide Program Administrator is to take advantage of existing experience and relationships.[6/] PG&E hopes that the chosen Program Administrator would already have the requisite partnerships as well as existing relationships with those serving the low income community. PG&E believes that phasing in the implementation of the SFLI Program would be unfair to low income customers living in parts of the state where the program is not initially implemented, and is concerned that this approach will result in these low income customers having less access to SFLI Program funds compared to others.

III. CONCLUSION

PG&E appreciates the opportunity to provide these reply comments and urges the Commission to modify the PD as outlined above.

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5/ CCSE Opening Comments, p. 6.

6/ See Proposed Decision, p. 21, "The chosen organization or agency should have experience providing services to low-income communities, be familiar with their needs, and have **existing trustworthy relationships** within these communities." (Emphasis added)

Respectfully Submitted,

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CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, Post Office Box 7442, San Francisco, CA 94120.

On the 13th day of November 2007, I served a true copy of:

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by electronic service to the e-mail addresses for the parties listed on the official service list for R.06-03-004.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 13th day of November, 2007 at San Francisco, California.

/s/

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