



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

**FILED**

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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 10-05-004  
(Filed May 6, 2010)

**MOTION OF SOLARCITY CORPORATION FOR PARTY STATUS**

September 2, 2010

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Pursuant to Rule 1.4 and Rule 11.1(b) of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, SolarCity Corporation (“SolarCity”) hereby moves for party status in the above-captioned proceeding.

SolarCity, a corporation incorporated in Delaware with its principal place of business in Foster City, California, is a full service provider of photovoltaic (“PV”) solar power systems for homeowners, businesses and government organizations. SolarCity provides integrated PV solar system services to its customers from a single source, including engineering design, financing, installation, leasing and monitoring services. SolarCity operates under California Contractors State License Board #888104 and has installed over 1,500 solar systems under the CSI Program during the past 12 months. SolarCity is an extremely high volume installer of solar systems under the CSI program in California.

As a solar system installer, SolarCity is interested in all aspects of the CSI Program, and will participate fully in the proceeding in order to provide the Commission with the benefit of its background and experience as an integrated solar system service provider and high volume installer of such systems. SolarCity is particularly interested, however, in certain changes to the current CSI Project Inspections Process that may address the unreasonable and disparate impact the current CSI inspection rules have and proposed changes to such rules may have on extremely high volume installers, like SolarCity.

The staff proposal regarding CSI Program Inspections Process would formally establish different thresholds for probation and suspension of less experienced system installers that do fewer installations each year than for high volume installers, but would allow the same number of system inspection “failures” and “infractions” for installers that do 200 installations per year as for more experienced installers that do 2000 installations per year.<sup>1</sup> Under the staff’s proposal, the acceptable rate of inspection discrepancies for the most experienced system installers that install extremely high numbers of systems each year would be far more stringent than for less experienced installers that install fewer systems each year but still meet the Commission staff’s definition of “high volume installers.”

Such a result would subject extremely high volume installers, including SolarCity, to unreasonable and inequitable standards that would be inconsistent with the intent of the Commission and the overall goals and objectives of the CSI Program. SolarCity therefore has a direct and significant interest in this proceeding.

SolarCity requests that all correspondence, pleadings, notices, orders, rulings and other communications concerning this proceeding be provided to the following:

John M. Stanton  
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<sup>1</sup> The Commission staff’s proposal in this regard would formalize standards currently contained in the CSI Program Handbook.

WHEREFORE, SolarCity respectfully requests that it be granted party status in this proceeding.

Respectfully submitted,

/s/

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Dated: September 2, 2010

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**[PROPOSED] ADMINISTRATIVE LAW JUDGE’S RULING ON  
MOTION OF SOLARCITY CORPORATION FOR PARTY STATUS**

On September 2, 2010, SolarCity Corporation (“SolarCity”) moved for party status in R.10-05-004. SolarCity has a direct and significant interest in this proceeding, and SolarCity’s intervention will not unduly broaden the issues under consideration in this proceeding.

Therefore, **IT IS RULED** that, good cause appearing,

1. The request of SolarCity for party status in R.10-05-004 is granted.
2. SolarCity shall serve all parties of record and any other entities designated for service with any pleadings filed by SolarCity in this proceeding.

Dated \_\_\_\_\_, 2010 at San Francisco, California.

\_\_\_\_\_  
Administrative Law Judge

**CERTIFICATE OF SERVICE**

I, John M. Stanton, certify:

I am employed in the City of Washington, D.C., am over eighteen years of age and am not a party to the within entitled cause. My business address is 575 7th Street, NW, Suite #400, Washington, DC 20004.

On September 2, 2010, I caused the following to be served:

**MOTION OF SOLARCITY CORPORATION FOR PARTY STATUS**

via electronic mail to all parties on the service lists R.10-05-004 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as “Parties” and “State Service” who have not provided an electronic mail address.

Executed on September 2, 2010 at Washington, DC

/s/

\_\_\_\_\_  
John M. Stanton

**VIA US MAIL**

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