

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



FILED

09-19-11
04:59 PM

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)

**REPLY OF ECHOFIRST INC. TO THE JOINT RESPONSE OF SOUTHERN
CALIFORNIA EDISON COMPANY, PACIFIC GAS AND
ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS
COMPANY, AND THE CALIFORNIA CENTER FOR
SUSTAINABLE ENERGY**

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September 19, 2011

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I. INTRODUCTION.

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), and with the permission of Administrative Law Judge Dorothy Duda to file a reply on this date, EchoFirst Inc. (“EchoFirst”) submits this reply to the Joint Response of Southern California Edison Company, Pacific Gas and Electric Company, Southern California Gas Company, and the California Center for Sustainable Energy (the “Program Administrators or PAs”) to EchoFirst’s Petition for Modification (“Petition”) of Decision (“D.”) 10-01-022 entitled *Decision Establishing the California Solar Initiative thermal Program to Provide Solar Water Heating Incentives* (“Response”).

In their Response, the Program Administrators agree that solar water heating (“SWH”) equipment certified by the International Association of Plumbing and Mechanical Officials (“IAPMO”) should be eligible for California Solar Initiative Thermal Program (“CSI TP”) incentives because they are tested to SRCC OG-300 standards and utilize OG-100 certified collectors, but they object to “opening up the field” to any NRTL or ANSI accredited laboratory unless specifically approved by the Commission. Additionally, the Program Administrators request a minimum 90-day implementation of IAPMO certifications. While EchoFirst maintains that any NRTL or ANSI accredited laboratory that certifies solar energy products is an eligible “qualified certifying body,” it does not debate that at this stage of the CSI TP it is reasonable to require Commission approval of this requirement. With respect to implementation of eligible IAPMO certifications in the CSI TP, EchoFirst objects to the proposed minimum implementation

period of 90 days for the OG300, and proposes instead a maximum of 30 days to implement IAPMO OG300 certifications and 120 days to implement IAPMO OG100 certifications.

II. DISCUSSION.

- A. The Commission should approve any NRTL or ANSI accredited laboratory that certifies solar energy products as an eligible “qualified certifying body,” on a case-by-case basis.**

EchoFirst appreciates the PA’s concurrence that IAPMO should be recognized and approved as a qualified certifying body in the CSI Thermal Program. While EchoFirst maintains that any NRTL or ANSI accredited laboratory that certifies solar energy products should be recognized as an eligible qualified certifying body in the CSI TP, it does not object, at this time, to an additional requirement of Commission approval. However, it is very important to open the CSI TP to competitive market conditions that ensure certifications are delivered in a timely and cost-effective manner. After the PAs have successfully expanded the CSI TP and have processed IAPMO certifications for six months, EchoFirst requests that opportunity to revisit the requirement for CPUC approval of additional qualified certifying bodies.

- B. The Commission should adopt a maximum implementation period of 30 days for IAPMO OG300 and a minimum 90 days for IAPMO OG100.**

EchoFirst objects to the PA’s proposal for a minimum period of 90 days to implement the IAPMO certifications in the CSI TP, and proposes instead a *maximum* of 30 days to implement IAPMO OG300 and a minimum of 90 days for IAPMO OG100. Supporting this proposal for implementation within 30 days, EchoFirst cites the example set by Arizona Public Service and Salt River Project, which implemented IAPMO OG300 certifications on the day they were approved as eligible. The IAPMO listing includes the certified system design schematics so there is no additional administrative documentation requirement. The CSI TP program need only upload the basic OG300 certification data, 16 fields, identified by the PAs in their Response.

To delay implementation beyond 30 days imposes undue hardship on EchoFirst and its customers. A 90-day implementation of the IAPMO OG300 would push processing of applications into 2012, well beyond what is reasonable. The recent re-appropriation of gas funds at the state level, resulting in no gas incentive funds under the California Advanced Home Program (“CAHP”). Significantly raises the criticality of timely implementation. Echo Solar Systems (renamed EchoFirst) participated in the CAHP in the past, but must now participate

instead in the CSI TP. Consistent reliable incentives are required for homebuilders to consider and market energy efficient solar homes. A 90-day implementation of IAPMO OG300 unfairly imposes an undue and unwarranted burden on EchoFirst and its homebuilder partners to bridge the financial gap created by the change to CAHP incentives and a long implementation of IAPMO OG300.

III. CONCLUSION

For the reasons stated above, EchoFirst respectfully requests that the Commission

- recognize and approve IAPMO certifications as eligible to participate in the CSI TP,
- require that implementation of IAPMO OG300 certifications begin no later than 30 days from the Commission's approval,
- revisit the need to approve other NRTL or ANSI accredited laboratories that certify solar energy products as eligible under the CSI TP after the PAs have successfully expanded the CSI TP and have processed IAPMO certifications for six months.

Respectfully submitted,



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