



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric
Company for Authority to Increase Electric
Rates and Charges to Recover Costs Relating
to California Solar Photovoltaic Manufacturing
Development Facility

Application 10-11-002
(Filed Nov. 3, 2010)

RESPONSE OF THE CITY AND COUNTY OF SAN FRANCISCO

The City and County of San Francisco (“City”) submits this response to PG&E's Application (“A.”) 10-11-002, pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure. The City identifies below several concerns with PG&E's application that require the Commission to obtain additional information before it considers approving PG&E's request.

The City's interest in this matter is based on the following: (i) the residents and businesses in San Francisco are PG&E ratepayers entitled to just and reasonable rates; (ii) the City has established a Community Choice Aggregation (“CCA”) program and believes CCA customers would be allocated a portion of the costs at issue in PG&E's application; (iii) the City has a strong interest in solar photovoltaic (“PV”) development and has aggressively supported solar PV projects with City monies¹.

PG&E's application seeks Commission approval to require ratepayers to pay for PG&E's investment in a solar PV manufacturing development facility to be built and operated by SVTC Solar, a subsidiary of SVTC Technologies, a for-profit entity based in Silicon Valley. The \$35.6 million requested here by PG&E would supplement \$98 million in funding from the Department of Energy, if SVTC Technologies is awarded those funds. The City supports the stated goals of developing new jobs, fostering

¹ For example, the City has established GoSolarSF, a program which provides significant financial incentives for rooftop solar systems within San Francisco.

innovation, and enhancing the production of cost-effective renewable energy. The City further agrees that the SVTC Solar proposal could promote achievement of California's renewable energy and greenhouse gas reduction mandates. But laudable goals are not a sufficient basis upon which to approve a request for ratepayers to fund PG&E's investment in a *private for-profit* company.

Despite the unusual nature of this request, the application provides only the most cursory information. The application includes no testimony and asks the Commission to approve the request without hearings. The actual impacts on ratepayers are addressed only briefly and in sparse detail. For example, the application states that ratepayers could potentially be reimbursed for their contribution “beginning after Year 5 and over a period of years, through an appropriate financial interest.” (Page 4.) Most investors would require additional detail before investing \$35 million. The Commission should require no less on behalf of PG&E's customers who already pay for research, development, and demonstration projects through the Public Goods Charge.

In considering this request, the Commission also must consider PG&E's growing participation in various sectors of the solar PV industry. For example, PG&E recently filed an advice letter regarding a PG&E affiliate that is now in the rooftop PV installation business and will participate in the California Solar Incentives program, which is funded by ratepayers and administered by PG&E. (See Advice Letter 3170-G/3763-E.) PG&E's financial incentives to promote ratepayer investments in a particular technology necessitate a more careful review by the Commission than is possible based on the contents of PG&E's application.

CERTIFICATE OF SERVICE

I, **PAULA FERNANDEZ**, declare that:

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City Attorney's Office, City Hall, Room 234, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102; telephone (415) 554-4623.

On December 3, 2010, I served **RESPONSE OF THE CITY AND COUNTY OF SAN FRANCISCO** by electronic mail on CPUC Proceeding No. A.10-11-002.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on December 3, 2010, at San Francisco, California.

/s/

PAULA FERNANDEZ



California Public Utilities Commission

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