

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



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Application of Southern California Edison Company
(U 338-E) for Authority to Implement and Recover in
Rates the Cost of its Proposed Solar Photovoltaic (PV)
Program.

Application No. 08-03-015
(Filed March 27, 2008)

**RESPONSE OF THE SOLAR ALLIANCE AND THE VOTE
SOLAR INITIATIVE**

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Date: April 28, 2008

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OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Authority to Implement and Recover in Rates the Cost of its Proposed Solar Photovoltaic (PV) Program.

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Pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure, the Solar Alliance and The Vote Solar Initiative¹ (hereinafter, the Joint Solar Parties) submit this response to the Application of Southern California Edison Company (“SCE”), filed on March 27, 2008 and published in the Commission’s Daily Calendar on March 28, 2008. This Response is timely filed.

I. OVERVIEW OF THE APPLICATION

In the Application, SCE requests authority to implement and recover in rates a Solar Photovoltaic (“PV”) Program. The Solar PV Program would consist of up to 250 megawatts (“MW”) of solar PV owned by SCE. The deployment of the 250 MW of solar PV would occur through the installation of approximately 50 MW during each year of the five year program with generation facilities sized at approximately 1 to 2 MW. SCE anticipates this program will further propel market transformation in the solar market by “attract[ing] investment, manufacturing, and expertise to California’s solar industry. This will increase

¹ The Vote Solar Initiative has given counsel for the Solar Alliance to sign this document on its behalf.

supply options and should reduce the cost for all solar PV products and services. In turn, broadening and deepening the local solar PV market will produce savings in the State's CSI program. Simply stated, reducing the installed cost of solar PV will leverage the subsidy dollars already allocated to the CSI program and produce more capacity and energy deliveries for California's investment in solar PV." The Joint Solar Parties concur and believe that accelerating the scale of PV deployment in California will improve the economics of solar to the benefit of both solar customers and California power consumers in general by reducing delivery of expensive peak energy generated by conventional fossil resources.

SCE anticipates placing the facilities at locations not currently utilized or potentially underutilized for solar PV installations, such as large commercial roof space including warehouse roofs with little on-site load, through-out SCE's service territory. SCE anticipates being able to interconnect the PV facilities directly to the distribution grid, thereby avoiding costly and time-consuming transmission upgrades. SCE also anticipates working with building owners to identify energy efficiency measures which could be incorporated into existing and new structures and using existing demand reduction programs to create more fully utilized distribution circuits. The energy produced by the PV facilities would count towards meeting SCE's Renewable Portfolio Standard ("RPS") goals.²

II. RESPONSE

While the Joint Solar Parties' review of the Application is on-going, the Joint Solar Parties support many elements of the Application. The Joint Solar Parties are also enthused to see SCE recognize the benefits of distributed PV facilities including the ability of

² As a customer-hosted, but non-net metered generation resource, the energy produced by the PV facilities will not count toward the net meter cap in SCE's territory.

distributed PV facilities to negate the need for transmission upgrades. Additionally, the Joint Solar Parties support many of SCE's goals, including: (a) use of a potentially unutilized or underutilized siting resource close to distribution load to increase the value of PV facilities; (b) leveraging the deployment of the PV facilities to spur existing energy efficiency and demand reduction programs; and (c) sharing the results and "lessons learned", such as how solar PV systems of 1 to 2 MW in size interface with the distribution system, with other entities in the State. For these reasons, the Joint Solar Parties believe that the Application represents a solid first step in filling a gap between the California Solar Initiative ("CSI") and RPS programs. The Solar PV Program represents an opportunity to further spur development in the solar industry through well-designed partnerships between ratepayers, utilities, and the solar industry.

Without diminishing the Joint Solar Parties' support for these goals, the Application raises several concerns.

First, the Commission should reject at the onset of this case any attempt to modify the CSI program based on this Application. It is the Joint Solar Parties' understanding that SCE is not seeking to have the MWs developed in this program count towards the CSI goals established by Senate Bill No. 1; nor is SCE seeking to have program funding for the Solar PV Program taken from the CSI in this Application. However, SCE has reserved the right to request such changes in the future. The Joint Solar Parties believe any attempt to alter CSI program funding levels or goals now or in the future has the potential to seriously disrupt the development of California's solar industry. Careful consideration of any CSI program changes is always required to ensure the ability of the CSI to meet the goals of the program and avoid undermining the CSI's ability to achieve its goal of transforming the market for PV and bring PV into the energy resource mainstream. Increasing uncertainty over the availability of funding from the

CSI will seriously undermine the ability of the Solar Alliance's members and the rest of the solar industry to make investment decisions and plan their business over the long-term. It is precisely this long-term business planning and stability which is essential to the CSI achieving the ambitious goals set out for the program.

As a rationale to support its Application, SCE claims that it is able to install solar for lower cost than what would be achieved under the CSI. However, the CSI program leverages private investment to fund solar installations, while the SCE Application would have the ratepayer pay for the entire cost of installation, plus roof-space rental and the rate of return for the investments. Clearly, the ratepayers' portion of the total installed cost is far smaller under the CSI program, especially since the rebates decline over the life of the program.

Moreover, CSI program goals, requirements, and related matters are the subject of on-going efforts in R.08-03-008 and should only be discussed in that proceeding. For these reasons, the Joint Solar Parties believe the Commission should clarify at the onset of this proceeding that consideration of changing the CSI program as a result of this Application is not within the scope of the proceeding.

Second, the Application requests authorization for utility ownership of the solar PV generating assets. Currently, within SCE's annual solicitations for Renewable Portfolio Standard compliance as well as for long-term procurement, a wide range of ownership structures are allowed. The Joint Solar Parties see no reason to deviate from that approach in this case. It is possible that a Request for Offers ("RFO") soliciting private parties to construct, own, and manage the PV generating facilities in a manner similar to what SCE proposes for the Solar PV Program could achieve the program goals at a lower cost to ratepayers. For example, it is the Joint Solar Parties' understanding that the RFO process SCE was required undertake as part of

its acquisition of 250 MW of peaking capacity to meet resource needs for the summer of 2007 was successful in this respect.³ There is no reason to limit the RFO to an equipment-only procurement from solar companies when a number of solar companies have extensive experience managing and owning fleet deployments of distributed PV. The Joint Solar Parties request that the Commission expand the scope of SCE's RFO to permit respondents to provide a variety of bid structures to ensure the most effective and efficient deployment of distributed PV in SCE's territory.

Another possibility for addressing both the ownership structure set out in the Application and the reasonableness review thresholds in SCE's Application is through the establishment of a targeted feed-in tariff. While the CSI has been quite effective in stimulating the market for rooftop PV applications serving on-site load (a market that is effectively constrained to systems of 1 MW and below due to current net metering and CSI caps), and the state's RPS has generated a lot of activity in large, central station solar generation (a market currently limited by transmission), there is a middle ground that (as the SCE Application ably illustrates) constitutes an unexploited opportunity: large-scale PV, deployed at the substation level without the need for transmission, delivering wholesale electricity. The Joint Solar Parties recommend that the Commission consider whether a feed-in tariff could help the state meet its RPS goals by opening the market for PV installations, deployed in situations where there is no opportunity to serve on-site load, and no need to build new transmission. A properly designed feed-in tariff could provide the same stimulus and incentives to drive down system costs through increased system size within the solar PV market as envisioned in SCE's Application, and

³ See Assigned Commissioner's Ruling Addressing Electric Reliability Needs in Southern California for Summer 2007, filed August 15, 2006, in R.05-12-013 and R.06-02-013.

deliver the same benefits to ratepayers, with the added benefit of maintaining the competitive and open market orientation of the solar industry.

Third, the Application sets reasonableness review threshold targets for the Solar PV Program capital costs of \$5.50/watt for 2008, falling to \$3.83/watt next year and remaining at that price through 2012 and then falling again to \$3.76/watt for the last year of the program in 2013. Most industry-accepted solar cost trajectories forecast costs to decline over time, though not to the levels seemingly expected by SCE in 2009. SCE will almost certainly be required to go through a reasonableness review to recover program costs in the early years. To avoid delays in program implementation due to reasonableness review, the Joint Solar Parties recommend that the reasonableness targets reduce by a linear amount annually.

Moreover, the uncertainty inherent in any forecast underscores the necessity for a competitive RFO process to elicit the best pricing for this program. A variety of ownership options and competition between industry players will allow the solar industry to offer creative alternatives that simply won't appear in a program that relies solely on venerable utility practices.

Fourth, Public Utilities Code Sec. 2775.5 requires specific findings by the Commission before the Application can be authorized. Section 2775.5(b) requires the Commission to deny the Application if the Commission finds the proposal will restrict competition or growth of the solar industry or unfairly leverage "any financial, marketing, distributing, or generating advantage" the public utility might have. Section 2775.5 also requires an affirmative finding that the proposed program will "accelerate the development and use of solar energy systems in this state for the duration of the program". The Joint Solar Parties intend to participate in this proceeding to facilitate the Commission's review of this Application under

Section 2775.5. Furthermore, the Solar Alliance believes addressing the concerns contained herein will represent a positive step in meeting the requirements of Section 2775.5.

SCE's Application represents a bold effort to fill a gap in current Commission policies regarding solar PV. However, the Application also raises many questions regarding existing policies and the impact the Application could have by setting a precedent for future Commission action. For this reason, the Joint Solar Parties believe the Application should be given a careful and thorough review during the course of this proceeding through testimony and hearings. To this end, in addition to addressing the concerns above, the Joint Solar Parties respectfully request that the scope of the proceeding be defined so as to allow the following questions be addressed to help clarify SCE's proposal:

- Why does SCE believe that the CPUC might make the CSI program goals mandatory?
- Can SCE provide to the public its analysis (and sources for reference materials), contracted surveys, or other methods used to determine its reasonableness review threshold targets? How frequently does SCE intend to conduct analysis to refresh these threshold targets, and using what data and information?
- How will SCE determine if the program is successful enough to merit an expansion?
- Is SCE witnessing any postponement of customer applications to the CSI due to the prices proposed in the SCE proposal?
- How many RFOs does SCE expect per year for the installations, and of what capacity size?

- Will the SCE testimony in its annual ERRA reasonableness proceeding, in which SCE makes its case for rate-base recovery of costs above the reasonableness threshold, be made public and provided to the service list of the CSI proceeding? What supporting analysis and materials will SCE provide in tandem with this request?
- Does SCE intend to comingle these installations with its CSI MW targets and budgets in public information on the success of the CSI program?

III. COMMUNICATIONS AND SERVICE

For the purpose of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following representative of the Solar Alliance should be placed on the service list as a “party”:

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IV. COMPLIANCE WITH RULE 2.6

In compliance with Rule 2.6 of the Commission’s Rules of Practice and Procedure, the Joint Solar Parties state the following:

1. The Joint Solar Parties do not object to SCE’s proposed category for this proceeding as “ratesetting.”
2. The Joint Solar Parties agree with SCE that there may be a need for hearings in this proceeding in order to develop a complete record with respect to the issues raised by the Application.

3. The Joint Solar Parties do not disagree with the list of issues which SCE has set forth for consideration in the proceeding so long as the issues raised in this Response are addressed within the proceeding.

4. The Joint Solar Parties believe the proposed schedule presented by SCE for this proceeding, while ambitious, is workable with relatively minor modifications. SCE's proposed schedule does not provide intervenors sufficient time to conduct discovery, nor does the schedule provide time for parties to explore settlement options after the submission of Opening and Rebuttal Testimony. Allowing appropriate time for these efforts will focus resources at hearing and still allow Commission consideration of the Application very soon after the original date proposed by SCE in its Application. With these concerns in mind, the Joint Solar Parties propose the following schedule:

Protests Due	April 28, 2008
Reply to Protests	May 8, 2008
Prehearing Conference	May 15, 2008
ORA and Intervenors File Opening Testimony	July 17, 2008
Rebuttal Testimony Due	July 31, 2008
Hearings	September 8-11, 2008
Concurrent Opening Briefs	October, 9, 2008
Concurrent Reply Briefs	October 23, 2008
Commission Issues Proposed Decision	January 8, 2008
Comments on Proposed Decision	January 28, 2008
Reply Comments on Proposed Decision	February 2, 2008
Commission Issues Final Decision	February 2009

V. **CONCLUSION**

SCE's Application represents a bold proposal to address a segment of the solar market not being covered under current programs by utilizing roof space and other locations which would otherwise sit idle or be under utilized as a solar resource. The Joint Solar Parties intend to be active participants in this proceeding exploring the concerns raised above and other issues in the proceeding. The Joint Solar Parties look forward to working with parties and the Commission in this proceeding to make SCE's program a success.

Respectfully submitted this April 28, 2008 at San Francisco, California.

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By /s/ Joseph F. Wiedman
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CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 28th day of April 2008 caused a copy of the foregoing

RESPONSE OF THE SOLAR ALLIANCE AND THE VOTE SOLAR INITIATIVE

to be served on all known parties to A.08-03-015, A.07-11-011 and R.08-02-007 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of April 2008 at San Francisco, California.

/s/ Lisa Vieland
Lisa Vieland

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