



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 08-03-008
(Filed March 13, 2008)

PREHEARING CONFERENCE STATEMENT OF THE DIVISION OF RATEPAYER ADVOCATES

I. INTRODUCTION

Pursuant to the Administrative Law Judges' Ruling of March 13, 2008 and Rule 7.2. of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Division of Ratepayer Advocates ("DRA") hereby submits this prehearing conference ("PHC") statement to the Order Instituting Rulemaking ("OIR") ("R.") 08-03-008 regarding policies, procedures, and rules for the California Solar Initiative, the Self-Generation Incentive Program and other distributed generation issues.

The OIR directed parties wishing to file PHC statements to do so no later than April 11, 2008. The PHC statements are to comment on the preliminary scoping memo in the OIR and on the Commission's preliminary determination that hearings are not necessary.

II. COMMENTS

The purpose of the OIR is to continue the work commenced under Rulemakings R.98-12-015, R.99-10-025, R.04-03-017, and R.06-03-004. To that end, the OIR identifies broad categories of issues to be addressed: Further development of policies and program rules in support of the California Solar Initiative; consideration of distributed generation policy issues generally and ongoing management of the Solar Generation Incentive Program; and resolution of the cost-benefit methodologies initially explored in

R.04-03-017. The Preliminary Scoping Memo sets about describing the issues in greater detail.

DRA finds the Preliminary Scoping Memo to be complete and sufficient, at this time. DRA observes that unforeseen issues are likely to arise, for example, as a result of developments in other Commission proceedings addressing related matters.

At this time, DRA is not prepared to waive the right to hearings. DRA believes it is premature at this juncture to make a determination on whether hearings will be necessary. Indeed, in the case of overlapping issue areas identified in the OIR such as CSI Program Evaluation (3.1.4) and Distributed Generation Cost-Benefit Methodology (3.3), there very well may be a need for evidentiary hearings. Continuing concerns about the relative cost-effectiveness of the CSI and SGIP programs, and their viability as demand-side resource management alternatives to central power plants and transmission line upgrades are likely to require the close scrutiny that is only possible with an evidentiary hearing. Therefore, DRA proposes deferring deciding the need for hearings until later in the proceeding.

Finally, DRA does not oppose the preliminary categorization of the proceeding as “quasi-legislative.”

Respectfully submitted,

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April 11, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**PREHEARING
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Executed on April 11, 2008 at San Francisco, California.

/s/ MARTHA PEREZ

MARTHA PEREZ

N O T I C E

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