



FILED

07/28/26

04:59 PM

C2607017

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

Joshua A. Stewart

Complainant,

vs.

Southern California Edison Company (U 338-E)

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
Joshua A. Stewart 21603 Kyra Ct, Santa Clarita, CA 91390 818-262-7473 joshuaastewart@sbcglobal.net	Southern California Edison Company (U 338-E), Attn: Anna Valdborg, Director & Managing Attorney 2244 Walnut Grove Ave., Rosemead, CA 91770 T-626-302-6008 Email 1: Anna.Valdborg@sce.com Email 2: case.admin@sce.com Email 3: AdviceTariffManager@sce.com

(Internal Use Only)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMPLAINT

Additional complainant(s) (Provide name, address, phone number and email address for each complainant)

Name of Complainant	Joshua A. Stewart
Address	21603 Kyra Ct, Santa Clarita, CA 91390
Daytime Phone Number	818-262-7473
Email Address	joshuaastewart@sbcglobal.net

☒ One/sole complainant is representative listed in Box C-1☐ Additional complainants listed in attachment

Additional Defendant(s) (Provide name, address, phone number and email address for each defendant)

Name of Defendant	Southern California Edison Company (U 338-E), Attn: Anna Valdborg, Director & Managing Attorney
Address	2244 Walnut Grove Ave., Rosemead, CA 91770
Daytime Phone Number	T-626-302-6008
Email Address	Anna.Valdborg@sce.com, case.admin@sce.com, AdviceTariffManager@sce.com

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES ☐ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$ _____

Has staff responded to your complaint?

☒ YES ☐ NO

Is your service now disconnected?

☐ YES ☒ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES ☒ NO

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Complainant contracted with SolarTech on October 12, 2025 for a solar system (Project NST-473325) to interconnect under NEM 2.0, an application originally submitted April 4, 2023, before NEM 2.0 closed to new applications on April 15, 2023. Permitting was delayed through no fault of either party (City of Santa Clarita's outside reviewer, JAS Pacific, was backlogged from the January 2025 fires). SCE says an extension window (1/14-3/13/2026) was announced to contractors on 12/30/2025, before SolarTech was Applicant of Record, and has never shown this notice reached Complainant. Complainant's 3/4/2026 outreach to SCE's engineer went unanswered, and his 3/27/2026 extension request was denied as late, per SCE's Review Manager review confirmed 4/13-4/30/2026. On 5/1/2026 SCE's own Review Manager admitted SCE could produce only a generic template notice, not proof one was sent to Complainant, though SCE bears the Rule 21 burden of notice. Routine PowerClerk notices were always copied to Complainant and SolarTech; the one that mattered was not. On 5/21/2026 CAB closed the informal complaint (Case 725205) siding with SCE, yet SCE's own system kept treating the project as NEM 2.0 through 6/22/2026. On 6/26/2026 SCE gave five business days to upload a post-installation Final Inspection that could not exist, since installation was paused pending this dispute, and on 6/30/2026 withdrew NST-473325. Full statement of details attached as Attachment 1.

Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):

- ☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
☐ ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

- (a) Did SCE meet its Rule 21 duty to notify the Applicant of the extension window.
 (b) Was SolarTech or Complainant the Applicant of record on 12/30/2025, when SCE says the notice was announced.
 (c) Was the original NEM-ST application, submitted 4/4/2023 and predating the 4/15/2023 NEM 2.0 closure, still entitled to NEM 2.0 treatment.
 (d) Are Rule 21 reinstatement criteria met (SCE error, or cure within 5 business days).
 (e) Should the 6/30/2026 withdrawal, forced by a Final Inspection deadline the project could not meet, be set aside and NST-473325 reinstated under NEM 2.0.
 (f) Did SCE violate Public Utilities Code Section 451 by enforcing deadlines through an Applicant-of-Record designation SCE's own records place six days after the notice date.

REPRESENTATIVE'S INFORMATION:

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: _____

Address: _____

Telephone Number: _____

E-mail: _____

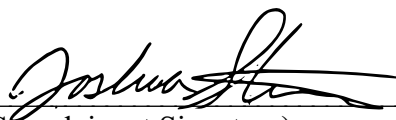
Signature: _____

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on 07/30/26, at Santa Clarita, California
(date) (City)


(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on _____, at _____, California
(date) (City)

Signature of Officer

Title

NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

Mail paper copies to: California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

July 30, 2026

Date

Joshua A. Stewart

Print your name

ATTACHMENT 1: Full Statement of Details

*Joshua A. Stewart v. Southern California Edison Company (U 338-E) | Project NST-473325 | CPUC
Informal File #725205*

Complainant Joshua Stewart's solar generating facility at 21603 Kyra Ct, Santa Clarita, CA 91390 (Project NST-473325) originated as a Net Energy Metering (NEM) 2.0 interconnection request submitted April 4, 2023, before SCE closed NEM 2.0 to new applications on April 15, 2023. The application remained open and continuously monitored by SCE thereafter, including a Remain Active Form submitted June 27, 2025.

Complainant contracted with SolarTech Energy Systems, Inc. on October 12, 2025 to install the system and carry the existing NEM 2.0 application forward. SCE's own records confirm that on December 15, 2025, Stewart granted SolarTech access to his PowerClerk application, and that on January 6, 2026, the application was updated to "Contractor Install," at which point SolarTech became the Applicant of Record.

The project experienced a permitting delay outside either party's control. The City of Santa Clarita outsources plan review to JAS Pacific, which was backlogged handling permit volume from the January 2025 Los Angeles area fires.

SCE states that on December 30, 2025 it issued extension request guidelines, with a submission window of January 14 to March 13, 2026, to contractors including SolarTech, describing SolarTech as the Applicant of Record at that time. But SCE's own account elsewhere places SolarTech's designation as Applicant of Record on January 6, 2026, six days after that notice was purportedly sent. Before January 6, 2026, the Applicant of Record's point of contact in PowerClerk, and the owner email listed on the signed contract, was Stewart's own address, joshua@sbrroofing.com. SCE has never produced a copy of the December 30, 2025 notice, has never shown it reached that address, and SolarTech has told Stewart that it did not receive the notice either. A further reminder is said to have followed on January 13, 2026.

Stewart proactively sought help during the window: on March 4, 2026 he emailed SCE's assigned engineer, Eduardo Zul, and SolarBillingPlan@sce.com asking for a call to discuss the project, including the possibility of an extension, and received no response.

On March 27, 2026, Stewart submitted a written extension request. SCE states that on March 30, 2026, a representative spoke with Stewart and confirmed an April 14, 2026 deadline for submitting final documentation, a deadline separate from the January 14 to March 13, 2026 extension request window itself. SCE's Review Manager reviewed the matter with SCE's interconnection team beginning April 13, 2026, confirming the extension denial on April 28, 2026 and the reinstatement denial on April 30, 2026, stating reinstatement under Rule 21 is available only where an SCE error caused the withdrawal, or the deficiency was cured within five business days, and that neither circumstance applied.

Critically, on May 1, 2026, SCE's own Review Manager acknowledged, in the CPUC's own closing letter for informal Case 725205, that SCE could provide only a generic "template notice," not any copy showing the extension notice was actually sent to Stewart directly. SCE bears the burden under Rule 21 of notifying the Applicant, and has been unable to produce proof that it did so.

This is not SCE's normal practice. Routine PowerClerk notices, including the January 10, 2026 and February 18, 2026 status notices, were automatically sent to Stewart directly, at more than one of his email addresses, in addition to SolarTech. The one notice that mattered most, the December 30, 2025 extension window, did not follow that pattern and never reached Stewart or SolarTech.

On May 21, 2026, the CPUC Consumer Affairs Branch closed its informal review (Case 725205), finding SCE not in violation of Rule 21, and identified a fifteen business day window for an informal request to consider new evidence or appeal. That window passed without a further informal appeal.

Notwithstanding the denials, SCE's own system continued to treat the project as a live NEM 2.0 application. On June 22, 2026, SCE's PowerClerk sent an "Action Required" notice for NST-473325, stating documentation was needed before SCE could finalize the NEM 2.0 application and grant Permission to Operate. The notice's checklist showed the Interconnection Agreement already on file and only the post-installation Final Inspection pending, confirming SCE's own records still carried this as a NEM 2.0 application weeks after the denials Complainant disputes. Stewart followed up with SCE three times between June 22 and June 25, 2026; SCE's June 25, 2026 response stated only that its position remained unchanged and deferred to SolarTech.

On June 26, 2026, SCE advised that the project had five business days from June 22, 2026 to upload the Final Inspection, and that the application would otherwise be withdrawn on June 30, 2026. The system has not been installed: SolarTech intentionally paused construction because the NEM 2.0 versus NEM 3.0 determination directly affects battery sizing and system design, and a Final Inspection can only occur after installation.

On June 30, 2026, exactly as SCE had warned, SCE's PowerClerk issued an "Application Withdrawn" notice for NST-473325, closing the application for the missing Final Inspection. The notice confirms that NEM 2.0 has been closed to all new applications since April 15, 2023, and directs Complainant to reapply, if at all, under the Solar Billing Plan (NEM 3.0). Because a Final Inspection can only occur after installation, and installation was deliberately paused pending resolution of this very dispute, the withdrawal was the predictable result of SCE enforcing a post-installation milestone against a pre-installation, disputed application. Absent Commission intervention, this withdrawal permanently forecloses NEM 2.0 eligibility for a project validly submitted and pending years before the program closed.

Complainant further contends that SCE's conduct violated Public Utilities Code section 451, which requires every public utility to furnish adequate, efficient, just, and reasonable service, and requires that a utility's rules and practices be just and reasonable. SCE enforced a tariff deadline, the extension request window, against an Applicant it cannot show it properly notified, by its own account naming an Applicant of Record that did not yet hold that status when the notice was purportedly sent, then enforced a second deadline, the post-installation Final Inspection requirement, against a project whose installation was reasonably paused pending resolution of the first dispute. Enforcing deadlines through a process SCE's own records cannot support is not the just and reasonable service section 451 requires.

Complainant contends SCE cannot show it satisfied its Rule 21 notice obligation, that SCE's own account of the December 30, 2025 notice is inconsistent with SCE's own Applicant of Record timeline, and that the loss of the extension window, and the subsequent June 30, 2026 withdrawal of NST-473325 itself, are the product of that notice failure and of permitting delay attributable to the City's third party reviewer, not to any fault of Complainant. Complainant seeks an order reinstating the withdrawn NST-473325 application, specifically and as originally filed in 2023, under the NEM 2.0 tariff, and directing SCE to process the interconnection accordingly once construction is complete.

ATTACHMENT 2: Full Statement of Relief Requested

*Joshua A. Stewart v. Southern California Edison Company (U 338-E) | Project NST-473325 | CPUC
Informal File #725205*

Complainant respectfully requests that the Commission order that:

1. SCE immediately reinstate Project NST-473325, as originally filed in 2023, as a Net Energy Metering (NEM) 2.0 interconnection application in good standing, notwithstanding the June 30, 2026 withdrawal, on the ground that the withdrawal resulted from enforcement of a post-installation milestone (Final Inspection) against a project whose installation was reasonably paused pending resolution of this dispute, and not from any fault of Complainant.
2. SCE not require Complainant to reapply under the Solar Billing Plan (NEM 3.0), and not treat the April 15, 2023 NEM 2.0 closure date as a bar to reinstating this specific, previously pending application.
3. SCE hold NST-473325 open, without further Final Inspection deadline penalties, until the NEM 2.0 eligibility question is resolved and Complainant has had a reasonable opportunity to complete installation.
4. SCE process the interconnection and grant Permission to Operate under the NEM 2.0 tariff once installation and final inspection are complete.
5. The Commission grant such other and further relief as it deems just and reasonable.