



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

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Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the Self-
Generation Incentive Program and Related Issues.

R.20-05-012

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON THE PROPOSED DECISION CLOSING RULEMAKING 20-05-012

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Pursuant to Rule 14.3(d) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Southern California Edison Company (SCE) submits the following *Reply Comments* on the Proposed Decision Closing Rulemaking 20-05-012 (PD).

I.

INTRODUCTION

On August 14, 2026, the Commission issued the PD closing Rulemaking (R.) 20-05-012. The California Solar & Storage Association (CALSSA) filed comments on September 3, 2026, requesting that the Commission delay closure of the proceeding and adopt additional program modifications.¹ SCE submits these Reply Comments to address certain claims raised by CALSSA and to provide updated information demonstrating the significant progress that has occurred in the Self Generation Incentive Program's (SGIP) Residential Solar and Storage Equity (RSSE) application review and incentive payment processing since the issuance of the Commission's recent rulings.

¹ CALSSA Comments, Subject Index.

II.

PAYMENT PROCESSING OF SGIP APPLICATIONS HAS SIGNIFICANTLY IMPROVED

CALSSA argues that closing the proceeding at this point would be “premature” and urges the Commission to “hold the PD” until several issues are resolved.² CALSSA’s primary concern seems to revolve around the speed of payment processing of SGIP applications.³ CALSSA cites Program Administrators (PAs) as only processing “276 payments every six weeks” and states that “it will take nearly two and a half years to pay all the projects in the queue” at that pace.⁴ The figures cited by CALSSA reflect a period during which PAs were working on the implementation of the Commission’s February 20, 2026 and July 10, 2026 Assigned Commissioner’s Rulings (ACRs) relating to Total Eligible Project Cost (TEPC) verification requirements, rather than the current pace of application review and payment processing following incorporation of that guidance into Program Administrator workflows.⁵

Since receiving clarification in the July 10, 2026 ACR, the rate of incentive payments has steadily increased. Over the last five weeks alone, SCE has processed 327 incentive payments, demonstrating a significant acceleration in payment activity. These results demonstrate continued progress in reducing the payment backlog and accelerating incentive payments now that TEPC verification requirements have been clarified. If this recent rate continues, the current inventory of Reservation Request Form (RRF) projects could be processed in approximately nine months once the projects advance to the applicable Incentive Claim Form (ICF) Pending Payment. As such, it is unnecessary to delay closure of this proceeding and adopt further

² CALSSA Comments, p. 1.

³ *See id.* at p. 4.

⁴ *Id.*

⁵ ACR on Enhancing Verification of Self-Generation Incentive Program Total Eligible Project Cost Before Distributing Incentive Payments, Rulemaking (R.) 20-05-012 (Feb. 20, 2026); ACR Directing Program Administrators of the Self-Generation Incentive Program to Deem Complete Project Cost Information with a Signed Attestation, R.20-05-012 (Jul. 10, 2026).

modifications to program requirements. SCE is continuing to process applications and issue payments expeditiously under the framework established by the Commission, and the record supports closure of the proceeding at this time.

III.

CONCLUSION

SCE appreciates the opportunity to submit these Reply Comments.

Respectfully submitted,

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