

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



April 28, 2009

**Advice Letter 2305-E**

Akbar Jazayeri  
Vice President, Regulatory Operations  
Southern California Edison Company  
P O Box 800  
Rosemead, CA 91770

**Subject: Proposed Amendments to the California Solar Initiative (CSI)  
Program Handbook to Revise Metering Requirements and  
Performance Based Incentive (PBI) Payment Terms and to  
Incorporate Performance Data Provider (PDP) Requirements**

Dear Mr. Jazayeri:

Advice Letter 2305-E is effective January 24, 2009.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie A. Fitch".

Julie A. Fitch, Director  
Energy Division

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December 26, 2008

**ADVICE 2305-E**  
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Proposed Amendments to the California Solar Initiative (CSI) Program Handbook to Revise Metering Requirements and Performance Based Incentive (PBI) Payment Terms and to Incorporate Performance Data Provider (PDP) Requirements

**PURPOSE**

In accordance with the California Public Utilities Commission's (Commission) General Order No. 96 B, Southern California Edison Company (SCE) hereby submits this Advice Letter to propose revisions to the most current edition of the CSI Program Handbook.<sup>1</sup> The proposed revisions make necessary changes to metering requirements and Performance Based Incentive (PBI) payment terms and incorporate Performance Data Provider (PDP) requirements.

**BACKGROUND**

The revisions proposed herein originated in the CSI public workshops held on December 12, 2007, February 26, 2008, and May 16, 2008. Subsequently, the CSI Program Administrators (PAs) met at their regular working group meetings to further discuss and refine the proposed revisions and a consensus among the PAs was achieved to warrant amendments to the CSI Program Handbook.

**PROPOSED CSI HANDBOOK REVISIONS**

The PAs' proposed CSI Program Handbook revisions, in redline format, are included as Attachment A with PG&E Advice Letter 3382-E, and are summarized below.

This advice filing revises sections of the CSI Program Handbook as listed below:

Sections:            2.8            Metering Requirements

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<sup>1</sup> The summary of revisions included herein were filed by Pacific Gas and Electric Company (PG&E) in Advice 3382-E and the California Center for Sustainable Energy (CCSE) on December 19, 2008.

3.3	Performance Based Incentives (PBI)
3.3.2	PBI for Residential Projects
3.3.3	PBI for Non-Residential Projects
4.1.1	Two-Step Process for Residential and Small Non-Residential Applicants
4.1.5	Step #2: Submit Incentive Claim Form Package
4.2.3	Three-Step Process for Non-Residential Applicants ( $\geq 10$ kW)
4.4.2.1	Required Documents for Incentive Claim Form Package
4.4.4	Incentive Check Payment and Terms
4.4.4.2	Performance Based Incentive Payment Terms
4.7.3.4	Copy of Executed PDP Contract
8.1	Acronyms
8.2	Definitions
11	Appendix B: Metering Requirements
11.1	Minimum Meter Requirements
11.1.1	Meter Type
11.1.3	Meter Measurement
11.1.5	Meter Certification
11.1.6	Meter Communication / Data Transfer Protocols
11.1.7	Meter Data Access
11.2	Minimum Communication Requirements
11.2.1	Required Solar Performance / Output Data
11.2.2	Minimum Report Delivery Requirements
11.2.3	Time Granularity of Acquired Data
11.2.4	Frequency of Data Collection
11.2.6	Frequency of Data Reporting
17	Appendix H – CSI PBI Data Transfer Rules

**Redefine PBI basis from “actual” energy produced to “gross” energy produced for electric generating technologies.**

This revision is needed to clarify what is meant by energy production as it relates to PBI. The PAs find that the term “gross” should be used instead of “actual”, or in some cases “net”, to define production as the Commission originally intended, i.e., as the one-directional photovoltaic system production being fed into the electric grid. Electric displacing technologies will still be a net calculation based on the CSI Program Handbook section pertaining to non-PV electric-displacing technologies.

Affected Section(s): 3.3 / 3.3.2 / 3.3.3 / 4.4.4.2 / 11.1.3 / 11.2 / 11.2.1 / 17

**Redefine the accuracy of the electric meter to include the accuracy of the metering system components.**

This revision is needed to include current transformer accuracy, potential transformer accuracy and computational errors in determining the accuracy of the electric metering system.

Affected Section(s): 2.8 / 8.2

**Clarify when PBI payments should be expected.**

Additional clarification is needed as to when the first PBI payment will be issued by a CSI PA.

Affected Section(s): 4.4.4 / 4.4.4.2

**Create the retroactive PBI payment exceptions and stipulations.**

Currently, PBI payments are paid in monthly installments for a period of five (5) years, with payments beginning on a monthly basis after the commissioning (Final Approval from PA) of the system. This has created an unforeseen issue within the photovoltaic installer community in that systems that have been interconnected and are generating power are experiencing losses on the net present value of PBI Payments from the time of interconnection to the first payment of PBI. These unexpected losses have driven the CSI PAs to develop a more customer-centric way to initiate the PBI Incentive Payment process that supports the marketplace and decreases any additional barriers for photovoltaic developers.

Affected Section(s): 4.4.4.2

**Further conform the CSI Program Handbook to the final PDP Protocol.**

The June 30, 2008, Administrative Law Judge's Ruling Providing Notice of Energy Division Performance Data Provider Workshop Report (Workshop Report) directed the filing of an advice letter on behalf of the CSI PAs with CSI Program Handbook changes as directed by the Workshop Report. On July 30, 2008, SCE filed Advice Letter 2258-E with proposed changes to conform the CSI Program Handbook to the final PDP Protocol. SCE has found that additional revisions are necessary to: (1) insert the new requirement for a PDP contract in the tables and text of the document description; (2) provide a definition of "PDP"; (3) define the responsibilities of the system owner versus the PDP with regard to metering accuracy and certification; (4) state that the CSI PAs are not liable for the non-performance of a PDP; (5) provide a description of the qualification process for PDPs and state the requirement that only qualified PDPs are allowed to participate; (6) insert "and/or PDP" wherever "PMRS" is referenced; and (7) indicate that a PDP requirements document exists for each PA to qualify PDPs for their area and that these documents can be found on each PA's individual website.

Affected Table(s): 8 / 9

Affected Section(s): 4.1.1 / 4.1.5 / 4.2.3 / 4.4.2.1 / 4.4.4 / 4.4.4.2 / 4.7.3.4 / 8.1 / 8.2 / 11 / 11.1.6 / 11.1.7 / 11.2 / 11.2.1 / 11.2.2 / 11.2.3 / 11.2.4 / 11.2.6

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

**TIER DESIGNATION**

Pursuant to D.07-01-024, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

**EFFECTIVE DATE**

SCE requests that this filing become effective on January 24, 2009, the 30th calendar day after the date filed.

**NOTICE**

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri  
Vice President of Regulatory Operations  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Bruce Foster  
Senior Vice President, Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2040

December 26, 2008

San Francisco, California 94102  
Facsimile: (415) 673-1116  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4, of General Order No. (GO) 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B and R.06-03-004 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters>.

For questions, please contact Robert Botkin at (626) 633-3398 or by electronic mail at [Robert.Botkin@sce.com](mailto:Robert.Botkin@sce.com).

**Southern California Edison Company**

Akbar Jazayeri

AJ:rb:jm  
Enclosures

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: [James.Yee@sce.com](mailto:James.Yee@sce.com)

E-mail Disposition Notice to: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
 PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2305-E

Tier Designation: 2

Subject of AL: Proposed Amendments to the California Solar Initiative (CSI) Program Handbook to Revise Metering Requirements and Performance Based Incentive (PBI) Payment Terms and to Incorporate Performance Data Provider (PDP) Requirements

Keywords (choose from CPUC listing): Compliance, Metering

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required?  Yes  No

Requested effective date: 01/24/09      No. of tariff sheets: -0-

Estimated system annual revenue effect (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: \_\_\_\_\_

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: None

<sup>1</sup> Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

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Bruce Foster  
Senior Vice President, Regulatory Affairs  
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Southern California Edison Company  
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