

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 15, 2020

To the parties of Rulemaking (R.)14-07-002 and R.12-11-005:

***Subject: Deadline Extension for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Reconfigure their Interconnection Portals to Require Solar Providers to Upload Customer Wet Signatures on Solar Information Packet***

On June 14, 2019, I sent a letter to the R.14-07-002 and R.12-11-005 service lists that announced the dates for the public release of the Solar Information Packet (California Solar Consumer Protection Guide) pursuant to [Decision \(D.\)18-09-044](#) (NEM Consumer Protection Decision).

In that letter, I extended the date by which Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively “the utilities”) must reconfigure their interconnection portals to require solar providers to upload signed, in handwriting, pages of the [California Solar Consumer Protection Guide](#) and the Contractors State License Board (CSLB) [Solar Energy System Disclosure Document](#) from June 30, 2019 to September 30, 2019.

The NEM Consumer Protection Decision states that the customers’ attestation of having received and read the California Solar Consumer Protection Guide must be a handwritten (i.e. “wet”) signature.<sup>1</sup> On September 27, 2019, I sent a letter to the R.14-07-002 and R.12-11-005 service lists that extended the date by which the utilities must require solar providers to submit a wet customer signature on the California Solar Consumer Protection Guide from September 30, 2019 to January 28, 2020. During this period, the requisite signed pages may be signed by either a wet signature or an electronic signature. This letter is reproduced in Attachment 1 to this letter.

On January 2, 2019, Commissioner Martha Guzman Aceves released a [Proposed Decision modifying the NEM Consumer Protection Decision](#). If approved by the Commission, this Proposed Decision would establish provisions by which either wet signatures or electronic signatures may be used for the customers’ attestation of having read and received the California Solar Consumer Protection Guide. The earliest date that this Proposed Decision may be heard by the Commission is February 6, 2020.

Through this letter, I am extending the date by which the utilities must require solar providers to submit a wet customer signature on the California Solar Consumer Protection Guide from January 28, 2020 until the date on which a final decision is issued by the Commission. During this extension period, the requisite signed pages may be signed by either a wet signature or an electronic signature.

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<sup>1</sup> NEM Consumer Protection Decision, page 33.

For questions regarding the extension established in this letter, please contact Christopher Westling in the CPUC's Energy Division at [christopher.westling@cpuc.ca.gov](mailto:christopher.westling@cpuc.ca.gov).

Sincerely,

/s/ Simon Baker for

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division  
California Public Utilities Commission

# Attachment 1

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 27, 2019

To the parties of Rulemaking (R.)14-07-002 and R.12-11-005:

***Subject: 120-Day Deadline Extension for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Reconfigure their Interconnection Portals to Require Solar Providers to Upload Customer Wet Signatures on Solar Information Packet from September 30, 2019 to January 28, 2020***

On June 14, 2019, I sent a letter to the R.14-07-002 and R.12-11-005 service lists that announced the dates for the public release of the Solar Information Packet (California Solar Consumer Protection Guide) pursuant to [Decision \(D.\)18-09-044](#) (NEM Consumer Protection Decision). This letter is reproduced in Attachment A to this letter.

In that letter, I extended the date by which Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively “the utilities”) must reconfigure their interconnection portals to require solar providers to upload signed, in handwriting, pages of the [California Solar Consumer Protection Guide](#) and the Contractors State License Board [\(CSLB\) Solar Energy System Disclosure Document](#) from June 30, 2019 to September 30, 2019.

The NEM Consumer Protection Decision states that the customers’ attestation of having received and read the California Solar Consumer Protection Guide must be a handwritten (i.e. “wet”) signature.<sup>2</sup> Through this letter, I am extending the date by which the utilities must require solar providers to submit a wet customer signature on the California Solar Consumer Protection Guide from September 30, 2019 to January 28, 2020.

While I am providing an extension on the requirement to upload pages from the California Solar Consumer Protection Guide with a wet signature, I maintain September 30, 2019 as the date by which the utilities must reconfigure their interconnection portals to require solar providers to upload signed pages of the California Solar Consumer Protection Guide. During this 120-day extension period, these requisite signed pages may be signed by either a wet signature or an electronic signature. For more details on the signature requirement, see Appendix A “Clarification on Solar Provider Compliance Protocols.”

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<sup>2</sup> NEM Consumer Protection Decision, page 33.

Updated versions of the English-language and Spanish-language California Solar Consumer Protection Guide that exclude references to a customer wet signature are currently available on the [CPUC Solar Guide Webpage](#). Updated versions of the Chinese, Korean, Tagalog, Vietnamese, and audio versions will be available on the webpage next week.

For questions regarding the 120-day extension established in this letter, please contact Kerry Fleisher in the California Public Utilities Commission's Energy Division at [Kerry.Fleisher@cpuc.ca.gov](mailto:Kerry.Fleisher@cpuc.ca.gov).

Regards,

A handwritten signature in black ink that reads "Edward Randolph". The signature is written in a cursive, slightly slanted style.

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division  
California Public Utilities Commission

# Attachment A

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 14, 2019

To the parties of R.14-07-002 and R.12-11-005:

***Subject: Time Extension for Solar Information Packet Release and Pacific Gas and Electric, Southern California Edison, and San Diego Gas & Electric Requirement to Reconfigure Interconnection Portals, and Guidance on Solar Provider Compliance Protocols***

This letter provides an extension of time for the CPUC's Energy Division to post a Final Solar Information Packet (Packet) on its website. This letter also provides an extension of time for PG&E, SCE and SDG&E to reconfigure their interconnection portals to accept an upload of the Packet. Lastly, this letter provides clarification on solar provider compliance with regard to the Packet and the utilities' interconnection portal.

### Background

California Public Utilities Commission (CPUC) *Decision Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet* ([Decision \(D.\)18-09-044](#)) sets forth the process for the CPUC's Energy Division staff to develop a Packet for consumers.

The Decision states that the Energy Division will post a copy of the Packet on the CPUC's website no later than June 30, 2019. The Decision also requires the CPUC to translate the Packet into Spanish, Chinese, Tagalog, Vietnamese, and Korean, and to make an audio recorded version of the Packet available. The Decision further requires Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) (the utilities) to reconfigure their interconnection portals to require solar providers to upload signed, in handwriting, signature pages of the Packet and Contractors State License Board (CSLB) Solar Energy System Disclosure Document by July 30, 2019.

On April 26, 2019, the Energy Division released a Revised Draft Solar Information Packet and asked stakeholders for informal written comments on 1) the content of the packet, and 2) Energy Division's proposed implementation approach for solar providers to upload signed pages of the packet in the utilities' interconnection portals. The Energy Division received extensive informal written comments on both topics.

Per the Decision, the Director of the Energy Division is authorized to adjust the Packet schedule adopted in the Decision, if necessary, to ensure steps are taken in an efficient and cost-effective manner with sufficient time for review by the CPUC and stakeholders.

### Solar Information Packet Extended Release Dates

Due to the need to address the significant written comments submitted by stakeholders on the Revised Draft Solar Information Packet, I hereby extend the release date of the Packet. The Energy Division will release the Packet on the following schedule:

#### **Public Release Dates for Final Solar Information Packet**

- **July 15, 2019:** Energy Division will post a copy of the Final *English version* of the Solar Information Packet to the CPUC website.
- **August 30, 2019:** Energy Division will post a copy of the Final *Chinese, Korean, Spanish, Tagalog, Vietnamese and audio versions* of the Solar Information Packet to the CPUC website.

#### Extension for Utility Requirement to Reconfigure Interconnection Portals

As a result of the new schedule for the release of the Packet in all language translations, the date by which the utilities must reconfigure their interconnection portals to require solar providers to upload signed pages of the Packet and the CSLB Solar Energy System Disclosure Document must also be extended. I hereby extend the date by which the utilities must reconfigure their interconnection portals per the Decision to **September 30, 2019**.

#### Clarification on Solar Provider Compliance Protocols

I take this opportunity to clarify the compliance protocols for the solar providers submitting residential solar interconnection applications for single-family homes on or after September 30, 2019 in the utility territories.

- If a solar provider executes a contract with a residential customer for solar *on or after* September 30, 2019, the solar provider is required to upload the following documentation in the utility interconnection portal:
  - 1) Customer-initialed and customer-signed pages of the Packet as part of their interconnection application with a customer signature date (on the Packet) that precedes or matches the contract execution date.
  - 2) A completed CSLB Solar Energy System Disclosure Document<sup>3</sup>.
- If a solar provider executes a contract with a residential customer for solar *on or before* September 29, 2019, the solar provider is *not* required to upload customer-initialed or customer-signed pages of the Packet nor the CSLB Solar Energy System Disclosure Document as part of their interconnection application. Instead, the solar provider is required to upload the customer-signed and dated page of the solar installation contract in the field on the utility's interconnection portal that requests upload of the signed pages of the Packet and the field that requests upload of CSLB Solar Energy Disclosure Document. The upload of the signed and dated solar installation contract in these fields will serve as proof that the solar provider

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<sup>3</sup> A blank version of the CSLB Solar Energy System Disclosure Document is available at <http://www.cslb.ca.gov/Resources/Contractors/SolarDisclosureDoc.pdf>

has executed a contract on or before September 29, 2019 and is therefore not subject to the compliance obligations determined by the Decision.

Further details on new interconnection portal features will be communicated by the utilities to their solar provider email listservs at a later date.

For questions regarding the deadline extensions and compliance protocols provided in this letter, please contact Kerry Fleisher in the CPUC's Energy Division at [Kerry.Fleisher@cpuc.ca.gov](mailto:Kerry.Fleisher@cpuc.ca.gov).

Regards,

A handwritten signature in black ink that reads "Edward Randolph". The signature is written in a cursive, slightly slanted style.

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division  
California Public Utilities Commission