

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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September 29, 2020

To Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company

Subject: Deadline Extension for San Diego Gas & Electric Company to Reconfigure their Interconnection Portals to Comply with D.20-02-011 Ordering Paragraphs 3 and 4, and for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Require Upload of Signature Pages from the Updated Solar Consumer Protection Guide

On September 2, 2020, SDG&E submitted an extension request to the director of Energy Division which requests an additional extension of the implementation deadline for D.20-02-011 Ordering Paragraph 3 and Ordering Paragraph 4. In the letter, SDG&E wrote that “on July 22, 2020 Energy Division directed SDG&E to file an additional extension request via R.14-07-002 service list addressed to [Edward] Randolph.” This is inaccurate. At no point did Energy Division “direct” SDG&E to take action. Instead, Energy Division provided options for SDG&E on what avenues to take – all of which are in the Rules of Practice and Procedure, General Order 96-B, or other sources. In the future, it is recommended that SDG&E more carefully characterize its interactions with Energy Division.

On February 14, 2020, Decision (D.)20-02-011 was issued. The Decision modifies portions of D.18-09-044, allows for electronic signatures on the Solar Consumer Protection Guide under certain conditions, and mandates changes to the utilities’ interconnection processes.

Ordering Paragraph (OP) 3 of D.20-02-011 states that “Within 120 days after the issue date of this decision, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company (together, the utilities) shall modify their interconnection portals to require the signed attestation page to be included with the initialed and signed pages of the solar information packet [i.e., the Solar Consumer Protection Guide], to be uploaded to the interconnection portal, for every interconnection application for which a signed solar consumer information packet is required... If a solar provider executes a contract with a residential customer for solar on or after 120 days after the issue date of this decision, the solar provider is required to include the signed attestation page in the same portable document file as the customer-initialed and signed pages of the solar information packet...”

OP 4 of the D.20-02-011 states that “(a) Within 120 days after the issue date of this decision, [the utilities] shall modify their interconnection portals to enable uploading of an audit trail document, and to require uploading of an audit trail document for every interconnection application for which a signed solar consumer information packet [i.e., the Solar Consumer Protection Guide] is required, unless the interconnection applicant indicates that the customer chose to sign the information packet in handwriting. The utilities shall modify their interconnection portals to enable

interconnection applicants to indicate that the customer chose to sign the information packet in handwriting... If a solar provider executes a contract with a residential customer for solar on or after 120 days after the issue date of this decision, and if the customer chose to sign the solar information packet electronically, the solar provider is required to upload an audit trail document (and addendum, if applicable) containing all items identified in Section 3 of this decision...”

Since 120 days after the date of issuance fell on a Saturday (June 13, 2020), the deadline for implementation would have been Monday, June 15, 2020.¹ D.20-02-011 allows the director of Energy Division or his/her/their designee to adjust this schedule if necessary to ensure efficient and cost-effective implementation.

On May 8, 2020, San Diego Gas & Electric (SDG&E) submitted a letter to the CPUC Executive Director requesting an extension of the deadline to implement changes to September 30, 2021. The letter noted that D.18-08-008 authorized SDG&E’s plans to implement a new Customer Information System, which will “go live” on January 1, 2021. SDG&E then planned to implement a six-month stabilization period following the rollout of the new system. During this period, SDG&E stated that it cannot implement changes to their interconnection portal and as a result, would have to manually review applications in order to be in compliance with D.20-02-011. This would have likely resulted in a dramatic increase in interconnection application processing times during the summer, which often sees a surge in rooftop solar installations.²

On June 5, 2020, I sent a [letter](#) to the R.14-07-002 and R.12-11-005 service lists. The letter extended the date by which the utilities must implement D.20-02-011 Ordering Paragraph 3 and Ordering Paragraph 4 from June 15, 2020 to September 30, 2020. The letter also stated that September 30, 2020 was the date on which the revised [Solar Consumer Protection Guide](#) would become effective.

In the September 2, 2020 letter, SDG&E noted similar concerns as were noted in their May 8, 2020 extension request, but requested an earlier implementation deadline of January 4, 2021. This request is reasonable.

Through this letter, I am extending the date by which SDG&E must reconfigure its interconnection portals to comply with D.20-02-011 OP 3 and OP 4 from September 30, 2020 until January 4, 2021. This extension applies only to SDG&E and does not extend the implementation deadlines for PG&E or SCE.

During this period from September 30, 2020 to January 4, 2021, solar providers operating in SDG&E’s service territory are requested to retain all records that would have been uploaded during the interconnection process, had this extension not been granted. This includes, but is not limited to, the audit trail and financial information outlined in D.20-02-011. It is our view that the retention of these records will be beneficial to NEM customers who are the victims of fraud.

The 2020 version of the Solar Consumer Protection Guide has been modified from the 2019 version to enable the utilities to comply with OP 3 of D.20-02-011. In D.18-09-044, the Commission adopted the recommendation that the solar information packet [i.e., the Solar Consumer Protection Guide] be translated into Spanish, Chinese, Tagalog, Vietnamese, and Korean. The translations of the 2020 version of the Solar Consumer Protection Guide have been delayed, with the result that they will not be available in time to become effective on September 30, 2020.

¹ California Public Utilities Commission Rules of Practice and Procedure, Rule 1.15 <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

² See California Distributed Generation Statistics (DGStats) <https://www.californiadgstats.ca.gov>

Through this letter, I am extending the date by which Pacific Gas and Electric Company, Southern California Edison Company, and SDG&E must require the upload of attestation/signature pages from the September 2020 version of the Solar Consumer Protection Guide from September 30, 2020 until October 30, 2020. The utilities should accept attestation/signature pages from either the 2019 or the 2020 version until that date.

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.

Sincerely,

 FOR

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