

Request for Comment on Revised Solar Information Packet and Implementation Approach

I. Background

The California Public Utility Commission's (CPUC/Commission) Energy Division held an all-day workshop on February 27, 2019 to solicit public feedback on a draft Solar Information Packet pursuant to the Commission *Decision Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet* ([Decision \(D.\)18-09-044](#)).

Energy Division Staff revised the draft Solar Information Packet content based on feedback received at the workshop and is distributing the Revised Solar Information Packet to the Service Lists of the Net Energy Metering Successor Tariff Proceeding (R.14-07-002) and the Distributed Generation Programs Proceeding (R.12-11-005) for informal feedback.

Energy Division is requesting informal feedback on two items:

1. The content of Energy Division's Revised Solar Information Packet.
2. Energy Division's proposed approach to implementing D.18-09-044 directives regarding deadlines for solar providers to upload signed pages of the Solar Information Packet and the Contractors State License Board (CSLB) Solar Energy System Disclosure Document into investor-owned utility (IOU) interconnection portals.

Feedback on the Revised Solar Information Packet will be used to inform a final version of the Solar Information Packet, which must be posted on the CPUC and utility websites by June 30, 2019 per D.18-09-044. Feedback on approach to implementing the directives from D.18-09-044 will be used to inform Energy Division's final guidance to stakeholders on deadlines for uploading signed document pages to the utilities' interconnection portals.

This informal feedback will not be considered part of the formal record of either R.14-07-002 or R.12-11-005.

II. Deadlines for Providing Feedback

Informal feedback on the Revised Solar Information Packet and on Energy Division's proposed approach to implementing D.18-09-044 is due by May 8, 2019.

Energy Division will also allow stakeholders to reply to feedback submitted by other stakeholders on Energy Division's proposed approach to implementing D.18-09-044 (item #2 above). Reply feedback must be provided by May 14, 2019.

Please email feedback and replies to the service lists of R.14-07-002 and R.12-11-005 and cc: Kerry Fleisher at Kerry.Fleisher@cpuc.ca.gov.

III. Directions for Providing Informal Feedback

i. Revised Solar Information Packet

Stakeholders are invited to submit written informal feedback on the content of the Revised Solar Information Packet to the Energy Division. This feedback may be submitted in any format; however, Energy Division staff prefers feedback be provided as redlines in track changes in the Word document and that comments be included in comment bubbles directly in the document.

Any graphics in the Revised Solar Information Packet are intended for illustrative purposes only. All visuals and formatting are subject to change when the CPUC's News and Outreach Division designs the final document. Energy Division staff encourages stakeholders to submit sample graphics for consideration as well as other design recommendations.

ii. Implementation of the Solar Information Packet: Questions for Stakeholders

[D.18-09-044](#) requires that the Energy Division post a final copy of the Solar Information Packet on the Commission's website by June 30, 2019 (p.20). The Decision also requires that

No later than 30 days after the Commission staff post a copy of the final solar information packet on the Commission's website, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company (together, the utilities) shall reconfigure their interconnection portals to require solar providers to upload signed, in handwriting, signature pages stating that customers have received both the Commission's solar consumer information packet and the Contractors State License Board's Solar Disclosures Document, prior to interconnecting a customer's system (p.55).

To implement this directive from in D.18-09-044, Energy Division proposes the following deadlines and signature requirements:

CPUC Solar Information Packet

- If a solar provider has executed a contract with a residential customer for rooftop solar *after* June 30, 2019 (date Information Packet is made available to the public), the solar provider will be required to upload customer-signed pages of the Solar Information Packet as part of their interconnection application with

a customer signature date (on the Information Packet) that precedes or matches the contract execution date.

- If a solar provider has executed a contract with a residential customer for rooftop solar *on or before* June 30, 2019, the solar provider will *not* be required to upload a customer-signed pages of the Solar Information Packet as part of their interconnection application.
- Solar providers must upload pages with a customer initial or signature to the interconnection portal (currently pages 1-4 and 18 of the Revised Solar Information Packet).

Contractors State License Board (CSLB) Solar Energy System Disclosure Document

- If a solar provider has executed a contract with a residential customer for rooftop solar *after* June 30, 2019, the solar provider will be required to upload a completed [Solar Energy System Disclosure Document Cover Page](#) as part of their interconnection application.
- If a solar provider has executed a contract with a residential customer for rooftop solar *on or before* June 30, 2019, the solar provider will *not* be required to upload a completed Solar Energy System Disclosure Document Cover Page.
- After the CSLB's [supporting information for the Solar Energy System Disclosure Document](#)¹ is codified into CSLB regulations, solar providers will be required to upload the customer-signed pages of the supporting information as part of their interconnection application.

Questions for Stakeholders:

Energy Division Staff seeks feedback from stakeholders on the questions below. Answers may simply be appended to the bottom of the redlined Revised Solar Information Packet, or may be submitted as a stand-alone document.

- 1) Do you agree with the Energy Division's above proposal for solar provider compliance in the interconnection portals? Why or why not?
 - a. If not, what alternatives do you suggest?
 - b. If you propose a different timeline for requiring solar providers to upload the signed documentation, please support your rationale for a different timeline with evidence that a different timeline is needed. For example, statistics on average time between contract execution and interconnection application

¹ The CSLB and CPUC are finalizing the supporting information to be included with the Solar Energy System Disclosure Document Cover Page. A final draft of the supporting information will be presented at a future public meeting for CSLB board member review. Once approved by the board, the documents will need to be approved by a final resolution of the CPUC before they go through a regulatory process in order to be codified into CSLB regulations.

submittal for residential customers, or other relevant practical evidence to support any divergence from Energy Division's proposal. Publicly available documentation is preferred.

- 2) Do you have recommendations for how the CPUC and utilities should rollout the Solar Information Packet and communicate the new compliance process with the solar industry?