

Context for Energy Division Draft Solar Information Packet

Energy Division staff is distributing a draft Solar Information Packet for residential rooftop solar customers pursuant to the Commission *Decision Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet* ([Decision \(D.\)18-09-044](#)). As the decision states, the goal of the information packet is to “enable consumers to make an informed decision about installing solar on their single-family homes and taking service under a net energy metering successor tariff, with particular attention to aggressive or unscrupulous sales tactics.”

The draft information packet generally follows Appendix A of D.18-09-044, which provided a suggested outline for the information packet. The outline in the decision was based on party comments, replies and attachments submitted in response to the December 8, 2016 *Administrative Law Judge’s Ruling Seeking Comment on Consumer Protection and Related Issues*, as well as party comments submitted to the Proposed Decision.

Given that solar consumer protection issues are dynamic and may shift as the industry and existing regulations evolve, Energy Division staff acknowledges that priority items for the information packet may have changed since original party comments were submitted at the beginning of 2017. Therefore, Energy Division staff views the draft information packet as a live document to be workshopped in collaboration with parties. As D.18-09-044 notes, the final information packet may contain revisions to the elements or structure of Appendix A based on stakeholder input.

Parties should note that the draft information packet contains proposed *content* for stakeholder review; no design actions have yet been taken. The content of the draft information packet was based on sample solar consumer protection documents filed by parties in Proceeding R.14-07-002 and a review of national and state-based solar consumer guides. After stakeholder feedback is considered for the final version, the information packet will enter the design phase.

D.18-09-044 sets forth certain requirements for the information packet. To ensure parties come to the workshop with a common understanding of these requirements, staff lists them below.

D.18-09-044 Requirements for Information Packet

- 1) In order to deter high-pressure sales tactics, the information packet will recommend that customers take at least 48 hours to review.
- 2) Solar providers interconnecting residential solar systems in Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) territories must obtain signatures on the information packet before the customer enters into a contract for a Power Purchase Agreement, lease, or purchased solar

system.

- 3) When finalized, the information packet will be translated, at a minimum, into the same languages as required by the California Civil Code 1632, which includes Spanish, Chinese, Tagalog, Vietnamese, and Korean. An audio recording of the information packet will also be provided, at a minimum in English.

Energy Division staff also created a set of guiding principles to inform the draft of the information packet. These guiding principles take into account requirements from D.18-09-044, legislative mandates from Assembly Bill ([AB 1070 \(Gonzalez Fletcher, 2017\)](#)), and anecdotal accounts of solar consumer abuses discussed at a July 2018 Public Forum in Huron, California. Staff lists these guiding principles below.

Energy Division Guiding Principles for Solar Information Packet

- 1) The information packet is primarily intended to serve prospective solar customers at the point of sale before they sign a contract for solar. The secondary purpose of the information packet is to educate customers interested in rooftop during the solar sales process.
- 2) The information packet shall be tailored to customers particularly vulnerable to aggressive acquisition tactics or predatory financing.
- 3) A “less is more” approach is most effective for reaching this target audience at the point of sale.
- 4) Though the information packet shall provide valuable information to customers across California regardless of utility territory, information may be directed to customers in PG&E, SCE, and SDG&E territories in certain places.
- 5) The information packet is intended to complement the [Contractors State License Board Solar Energy System Disclosure Document](#) when that document is finalized. The information packet shall avoid redundant information unless it provides value to the customer.
- 6) The information packet shall educate customers about their right to receive an electric bill savings calculation based on standardized inputs and assumptions pursuant to AB 1070. It shall direct customers to the CPUC website hosting this information when it becomes available.

In light of these guiding principles, parties should note that the content of the draft information packet will need to be shortened before entering the design phase. Pursuant to direction in D.18-09-044, Energy Division Staff will hold a workshop before March 4, 2019 seeking stakeholder feedback on the draft information packet. Please come to the workshop prepared to suggest ways to shorten or cut less critical information.

The exact date for the Draft Information Packet Workshop will be sent to the service list in early February. At the workshop, Energy Division intends to solicit feedback on the above guiding principles, content specific to each section, sequencing of information, and visual design. An Agenda and discussion questions will be sent in advance of the workshop. After the workshop, there may be the opportunity to provide written comments, depending upon the outcome of the discussion at the workshop.