

R.04-03-017

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Incentives for Distributed Generation and
Distributed Energy Resources.

RULEMAKING 04-03-017
(Filed March 16, 2004)

**Opening Comments of the San Diego Regional Energy Office
regarding Commissioner Peevey and ALJ Malcolm's Draft Interim Order
Adopting Policies and Funding for the California Solar Initiative**

San Diego Regional Energy Office

January 3, 2006

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1 INTRODUCTION

The San Diego Regional Energy Office (SDREO) is pleased to submit these opening comments regarding Commissioner Peevey and ALJ Malcolm's Draft Interim Order Adopting Policies and Funding for the California Solar Initiative. In addition to our individual comments, the Self Generation Incentive Program Working Group Program Administrators (SGIP Working Group PA), including SDREO, have submitted joint comments under separate cover. The SGIP Working Group PA comments represent a consensus position of the Program Administrators on the draft decision and related topics. SDREO here supplements that consensus position, or responds to topics of the Draft Decision that the SGIP Working Group PA chose not to address.

SDREO's comments are categorized under three general areas: overall solar program measures, solar program administration and implementation issues, and specific solar program components. **A summary of the topics is as follows:**

I. Overall Program Measures

1. Clarification of CSI Trigger Mechanisms
2. CPUC Action to Avoid Program Stop-Start in 2006
3. Statewide Database Benefits
4. Interim Performance Standards until Hybrid PBI in Use
5. Customer Financing for Energy Efficiency and CSI
6. Future Treatment of Non-Solar SGIP Technologies

II. Program Administration and Implementation

1. Clarification of 2006 Administration Budget

2. Program Administrator Language Clarifications
3. Regional Program Administration
4. Continuation of a Program Administrator Advisory Group
5. Enhanced Regional Participation in Proposed 2006 Procedural Schedule

III. CSI Program Components

1. Solar Water Heating (SWH) Pilot Program
2. Energy Efficiency Audits
3. High Efficiency Rebates
4. Low Income Customers and Affordable Housing Projects
5. Education and Outreach

2 OVERALL PROGRAM MEASURES

2.1 Further Clarification for Implementation of CSI Trigger Mechanisms

SDREO supports the implementation of declining rebate structure coupled with a capacity trigger to ensure optimal funding availability. It is unclear in the Draft Decision whether incremental capacity triggers will be applied statewide or within each respective service territory. SDREO recommends applying a statewide capacity trigger in order to maintain consistent rebate levels throughout the state. If large discrepancies in program participation exist across service territories, the Commission could evaluate and compare the rate and tariff schedules of each service territory to see if there are barriers for any customer class to take advantage of solar power within a service territory.

Section 4.6 of the Draft Decision states that incentive levels may vary according to each sector's market conditions.¹ SDREO requests that the Commission provide clear direction on how sector-specific market conditions should be evaluated in order to determine when a rebate should be reduced and which market sectors shall be considered when applying the proposed trigger mechanism given in Table 5, Appendix A.

¹ Draft Decision Appendix A, page 16.

2.2 The CPUC Should Take Action during the 2006 Transition Year to Reduce Program Disruption and the Stop-Start Nature of the Current Solar Market

The Draft Decision indicates that 2006 incentives will begin at \$2.80/W, but may decline mid-year to \$2.60/W. Table 5 in Appendix A of the Draft Decision indicates that CSI rebate level reductions (beginning January 1, 2007) will be triggered either by scheduled yearly reductions or by achieving the current year's incremental capacity, whichever happens first.

SDREO requests that the Commission further clarify the rebate schedule for 2006, detailing whether a capacity or funding trigger will apply to this transition year. Based on currently posted public data, SDREO calculates that if 100% of the wait listed statewide projects elect to proceed in 2006, the initial 50MW capacity trigger provided for the 2007 CSI program could be achieved immediately. If this capacity level is achieved in 2006, SDREO suggests that it serve as a trigger to lower the rebate.

With regard to a potential financial trigger in 2006, SDREO recommends that program administrators continue to be able to shift funds from SGIP Levels 2 and 3 up to Level 1 in the event that Level 1 funding is exhausted. If additional funding must be shifted from other SGIP Levels, SDREO recommends that this also serve as a trigger to reduce the rebate in 2006.

To expand on our reasoning for this, if 100% of the SDREO 2005 Wait List moves forward, funding is available for only 7.4MW of 2006 projects in the SDREO administrator territory.² This concerns us because we received close to 9MW of incentive requests in the first few months of 2005 before needing to close the program in March. Since SDREO has not accepted new applications since March, a significant number of new applications are expected when SGIP re-opens on February 1, 2006. SDREO anticipates that it may once again be oversubscribed in early 2006. SDREO recommends that the CPUC take additional action during this transition year to reduce disruption and the stop-start aspect of the solar rebate program by implementing these incentive reduction triggers.

² Based on \$2.80/W rebate and 2006 Budget Assumptions given in SGIP Working Group Program Administrator Comments, Section 10, Table 3.

In addition, SDREO recommends that each program administrator keep a running total of the statewide reserved capacity on their SGIP internet sites and future CSI site(s), updated monthly. This measure could help potential applicants stay informed about the possibility of reaching a rebate reduction trigger.

2.3 Benefits of a Statewide Database

SDREO believes that a uniform statewide database could enhance the following tasks:

- CPUC Reporting -- standardized reports could be run for each Program Administrator's territory as well as an overall snapshot of program;
- Providing a statewide data clearinghouse; and
- Setting incentives based on Appendix A, Table 5 capacity triggers and dates automatically.³

With the transition to a new 10-year CSI, this is the optimal time to develop improved tracking and data measures. Since the CSI will be a new program with its own budget, this could negate concerns some may have about stranded investments.

A properly implemented, Internet accessible, user-friendly statewide database could streamline the application process, administration and data collection activities. Applicants could use this online tool to download and submit program documents (such as the handbook, reservation request, incentive claims, etc.) as a "one-stop" shop while Program Administrators use the database for project management, monthly reporting and data collection activities. A shift to a statewide database could also provide an opportunity to integrate other program tracking functions like system performance.

³ If the capacity trigger is based on statewide capacity.

2.4 Establishing Interim Performance Standards until a Hybrid PBI is in Use

SDREO believes that integration of a performance-tracking measure would enable the Program Administrators, the state, and stakeholders to gain a clear understanding of the overall program performance and individual system performance. Project performance indicators could be integrated into any statewide database. In earlier CSI-related filings, some respondents have referenced (performance and cost-effectiveness) tracking tools including the CA Standard Practice Manual (SPM), PowerClerk, and COMSYS (Central Operating Management System). SDREO recommends that these various online tools with performance tracking capabilities be assessed. Implementation of a web-based, real time monitoring tool could be beneficial for the shift to performance-based incentives. A tool that can monitor the performance of installations will benefit the participant, the administrator, the ratepayers and the state.

SDREO also urges that CSI incentives for PV should be capped by the lesser of calculated system output or inverter rated output, rather than simply on the basis of installed capacity. This recommendation was previously stated in SGIP Working Group Program Administrator comments filed 12-5-05.⁴

2.5 Customer Financing for Energy Efficiency and CSI

Since CSI attempts to address multiple energy-saving goals by applying energy efficiency and solar measures in combination, SDREO would urge the commission to assess ways to combine on-bill financing programs for energy efficiency projects with financing for CSI. It is our understanding that SDG&E will be offering an on-bill financing option as part of its energy efficiency program portfolio for 2006-2008 which could potentially be integrated with CSI and serve as a model for other regions.

⁴ SGIP Program Administrators Joint Response to the Administrative Law Judge's Interim Opinion Adopting Policies and Funding for the California Solar Initiative, Dec. 5, 2005, page 6.

2.6 Budget and Future of SGIP Non-Solar Technologies must be Addressed and Clarified

The Draft Decision indicates that 2006 shall be a transition year and SGIP will continue to exist, but will no longer provide funding for solar technologies.⁵ The Draft Decision re-categorizes the current technology levels as follows for 2006: Level 1 - Solar, Level 2 - Renewable Fuel Projects (Non-Solar) and Level 3 - Non-Renewable Projects. SDREO supports the proposal to re-categorize the technology levels, but a number of issues remain unclear.

The Draft Decision states that funds shall be allocated equally among the three levels (\$125M / 3 = \$41.6M), but later states that the available Level 2 and Level 3 budgets shall be \$42.5M. SDREO requests the Commission accept the SGIP Working Group Program Administrators' recommended 2006 Level 2 and Level 3 budgets for eligible non-solar technologies.⁶

Additionally, as per D.04-12-045, SGIP is scheduled to sunset on December 31, 2007, however the Draft Decision indicates the SGIP budget shall be adjusted downward beginning January 1, 2007. SDREO recommends that the Commission establish a dedicated, long-term program to be applied to other self-generation technologies deemed to be beneficial to the state. Fuel cells, wind and combined heat and power technologies help the state achieve the goals of the loading order.

3 PROGRAM ADMINISTRATION AND IMPLEMENTATION

3.1 Commission Must Clarify 2006 SGIP Program Administrator Budgets

SDREO reiterates its support of the SGIP Working Group Program Administrator Comments⁷ with regard to clarifying and confirming the 2006 SGIP Budget for each administrator.

⁵ Draft Decision, Appendix A, p. 4.

⁶ SGIP Working Group Program Administrator Comments, Section 10.

⁷ SGIP Working Group Program Administrator Comments, Section 10.

3.2 Clarification of Decision Language regarding SGIP and CSI Administrator in the San Diego Region

SDREO recommends the Commission clarify some language in the Draft Decision to avoid potential confusion on the subject of program administration of SGIP and CSI. Decision 05-12-044 (approved December 15, 2005) adopts policies and funding for CSI, reiterates that SDREO is currently the SGIP program administrator, and states that it is the Commission's intention for the SGIP Administrators to administer CSI initially. However, throughout the Draft Decision and its Appendix A, Program Administrators for SGIP and future CSI are referenced in varying ways, sometimes as only the "utilities." SDREO provides a list of suggested revisions below. (Additions are in bold, deletions are in strikethrough). SDREO also suggests that language referring only to "utilities" be revised to refer to "Program Administrators" wherever relevant.

Section I, Procedural Background, page 2:

The report proposed that initially, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), **Southern California Gas Company (SoCalGas)**, ~~San Diego Gas & Electric Company (SDG&E)~~, and the San Diego Regional Energy Office (SDREO) would administer the CSI.

Section III, Program Funding, Table 3, page 8:

Table Title: Administrative and Evaluation Budgets by **Program Administrator**
~~Utility Service Territory~~
Heading 1: **Program Administrator** ~~Utility~~
Row 4: **SDREO** ~~SDG&E~~

Findings of Fact, number 20, page 12:

Program evaluation and monitoring for the CSI program, including the pilot SWH program, should be overseen by the CEC and/or the Commission staff. The **program administrators and SDG&E utilities** shall issue a request for proposal (RFP) for program evaluation consulting and should contract with consultants selected by the CEC and/or Commission staff, who will be responsible for all other contract decision-making and management.

INTERIM ORDER, number 2, page 15:

2. Pacific Gas and Electric Company (PG&E), **San Diego Regional Energy Office (SDREO)**, ~~San Diego Gas & Electric Company (SDG&E)~~, Southern California Gas Company (SoCalGas), and Southern California Edison Company (SCE) shall implement the program described in the staff report and adopted herein.”

APPENDIX A, Table 4, page 14:

Table Title: Administrative and Evaluation Budgets by **Program Administrator** ~~Utility Service Territory~~

Heading 1: **Program Administrator** ~~Utility~~

Row 4: **SDREO** ~~SDG&E~~

APPENDIX A, Section 4.14 page 22:

The **Program Administrators and SDG&E utilities** ~~and SDREO~~ should file a proposed outline and evaluation schedule with the CPUC by March 31, 2006, for approval by the Assigned Commissioner or Assigned Administrative Law Judge.⁸

3.3 Regional Program Administration

SDREO supports regional administration of the CSI. In particular, SDREO believes that the total amount of funds collected in a utility territory to support solar technologies should be spent in that territory. This ensures that the benefits accrue directly to the ratepayers that provided the funding. The current SGIP is funded by distribution charges, and as distribution is a local issue, SDREO recommends that funds remain at the local level.

SDREO also believes that customers benefit from regional administration. By being closer to customer, regional implementers can provide better customer service. Familiarity with local permitting processes, local utility requirements, and availability to conduct local promotional activities all improve overall service to the customer.

⁸ This language maintains consistency with previous references to program administrators in Draft Decision.

3.4 Commission Should Continue a Program Administrator Working Group

SDREO welcomes the idea of proposed public workshops and believes this measure should be coupled with a CSI Working Group similar to the SGIP Working Group. Public workshops would provide the necessary forum for the CPUC, CEC and CSI Working Group to interface with vested stakeholders including market participants, vendors, customers and utilities, in order to solicit input on program policies such appropriate rebate levels, program handbook development and program modifications. The CSI Working Group function should be administrative in nature to ensure consistency in statewide implementation.

SDREO believes that the CSI could be hampered by the omission of a similar entity to the SGIP Working Group consisting of regional program administrators and CEC and Energy Division staff. SDREO contends that the SGIP Working Group has played a critical role in the success of the SGIP program. The SGIP addresses a wide range of varying program modifications and concerns that we believe would not be appropriate to be discussed by a larger stakeholder group. So that policy and procedural matters are addressed more efficiently, a timeline for responding to program design and policy issues could be enforced at the Commission.

3.5 Proposed 2006 Procedural Schedule

With regard to the proposed schedule and activities, SDREO suggests that at least two weeks notice be given on workshop dates so that stakeholders and interested parties can actively participate in this proceeding. This will ensure that stakeholders have sufficient time to prepare for workshops and participate effectively. SDREO would urge the Commission to sponsor workshops in each utility service territory to ensure that interested parties across the state can better participate in the process.

4 PROGRAM COMPONENTS

4.1 CSI Solar Water Heating (SWH) Pilot Program

SDREO looks forward to further developing and refining a pilot SWH program in conjunction with CEC and CPUC staff. In 2003, SDREO developed a rebate plan for solar water heaters. The program concept was a performance-based rebate tied directly to the thermal output of the installed systems. Since the design and performance of solar water heaters varies from low-cost passive units to more expensive active systems, the program could provide rebates commensurate with the thermal output of the system. The program could provide rebates to both residential and non-residential customers who install qualifying solar hot water heating systems. SDREO, in conjunction with CEC and CPUC staff, will evaluate current market conditions and design CSI Pilot Program accordingly.

4.1.1 CSI Pilot Clarifications

SDREO requests clarifications on funding and implementation of the Pilot Solar Water Heater (SWH) portion of the CSI.

- Will the pilot apply to commercial and residential retrofit projects only, since it is addressed under the CERB heading of the Appendix? Will residential new construction projects also be eligible?
- SDREO requests budget clarification for the Pilot SWH component. SDREO would recommend that the Pilot program be funded separately, in addition to the CSI budget outlined in the Draft Decision. Upon implementation of a statewide SWH program, SDREO recommends a certain percentage of the CSI budget be identified for this program component.

4.1.2 SWH Outreach and Education

As part of the education and outreach that SDREO provides, the San Diego Energy Resource Center (ERC) is sponsoring a workshop on January 10, 2006 on SWH, *A Practical Guide to Solar Water Heating*. The workshop, which was scheduled well prior to this Draft Decision, will

provide an overview of the different types of technologies and applications available for commercial and residential projects, how to site a system and roof mounting techniques. Also covered will be typical costs, payback periods and energy savings. The target audience is end users and installers. This workshop will not address aspects of the pilot program development; it will focus on technical aspects of SWH installation.

4.2 SDREO Supports Making Energy Efficiency a Condition of Receiving CSI Incentives

SDREO supports the SGIP Working Group Program Administrator comments⁹ and recommends that the Commission direct implementers of existing energy efficiency audit programs to conduct assessments on behalf of the CSI program. SDREO supports the concept of utilizing energy efficiency and the concept of requiring an on-site audit, as this provides customers the opportunity to identify areas of energy savings that they may not have otherwise considered. These audits should be tracked within all respective energy efficiency or CSI programs to ensure that double counting of energy savings does not occur.

SDREO suggests that the proposed 2006 workshops include a discussion of metrics by which customers will demonstrate energy efficiency standards have been met and continuously implemented. SDREO recommends that the CPUC and CEC along with Program Administrators assess the energy efficiency audit component of the program after 12 months and determine if any additional measures must be taken to better integrate these program components. The assessment could address cost issues, and identify if any participants are negatively impacted should their site not qualify for an audit within current energy efficiency programs.

4.3 Higher Incentives for Efficiency

SDREO supports the idea of offering an increased rebate for high efficiency building projects but recommends that the threshold for an increased incentive be raised to promote

⁹ SGIP Working Group Program Administrator comments, Section 8.

higher performance building practices. The Draft Decision proposes to increase the rebate by a yet-to-be-determined percentage for new construction projects that exceed minimum efficiency standards by 10%. In the July 2005 Staff Solar Report, a figure of 25% increase of rebate was initially proposed, which SDREO reiterates could be too high a reward. To elaborate, if the rebate is \$2.80/watt, the high efficiency incentive would increase that by \$0.70 for a total rebate of \$3.50. SDREO would argue that the 10% increase in efficiency is not worthy of a 25% increase in incentives. Alternatively, we recommend the rebate rise one percent for each percent that the building is above code. If the building is 10% more energy efficient than code, the rebate would be increased by 10%.

4.4 Consider Evaluating Solar Program Options for Low-Income Customers and Affordable Housing Projects

SDREO is pleased that the Commission is including hard-to-reach markets in the CSI, but we are unsure whether a slightly higher rebate will be enough to enable program participation from low-income customers. SDREO suggests that instead the Commission develop a customized solar program for low-income customers and affordable housing projects that addresses the significant barriers to their participation. The CPUC, in conjunction with CARE Administrators, CSI Program Administrators, and other interested parties, could hold a workshop to develop a customized segment of the CSI that would address financing options and other implementation assistance for this market sector.

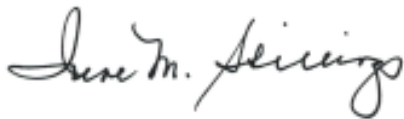
If the low-income and affordable housing component remains a rebate (as stated in the current draft decision), SDREO recommends that the Commission and CEC evaluate the rebate levels prior to shifting any unencumbered funds to other CSI program components. This evaluation would assess whether the rebate level is high enough to serve this hard-to-reach market or whether there are other factors involved that may limit these applications. Should the unencumbered funds be shifted to other projects, SDREO encourages the Commission to clearly indicate the percentage splits allocated to the commercial and residential retrofit sectors respectively.

4.5 Education and Outreach

SDREO strongly believes that education and outreach are essential to promoting the adoption of solar technology. We have conducted educational and outreach activities since 1999, when we launched our solar work with a U.S. Department of Energy Million Solar Roofs Initiative (MSRI). SDREO and the City of San Diego recently completed a GIS project mapping all large non-residential rooftops in the City and will conduct an outreach campaign based on the results. In October 2005, SDREO hosted the first annual San Diego Solar Week, with activities promoting solar energy which included the Solar Homes Tour, a Commercial Solar Tour, and a Solar Energy Conference. We welcome this integral program component to CSI.

5 CONCLUSION

SDREO looks forward to actively participating in the workshops and further development of the California Solar Initiative. We are also pleased to work with the CPUC and CEC staff to develop the Solar Water Heating Pilot Program. We strongly support the development of a long-term and predictable state solar program under the California Solar Initiative.



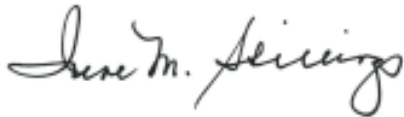
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of these Opening Comments regarding Commissioner Peevey and ALJ Malcolm's Draft Interim Order Adopting Policies and Funding for the California Solar Initiative on all known parties of record in this proceeding by delivering a copy via email to the current service list.

Executed on January 3, 2006.

A handwritten signature in cursive script that reads "Irene M. Stillings".

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