

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 18, 2017

Advice Letter 3616-E

Russell G. Worden
Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770

SUBJECT: Proposed Modifications to the SGIP to Incorporate CA Contractor's State License Board's C-46 Solar Contractor License Classification into List of SGIP Eligible Licenses for the Combined Installation of Solar Photovoltaics & Energy Storage

Dear Mr. Worden:

Advice Letter 3616-E is withdrawn per SCE withdrawal letter dated July 11, 2017.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: SCE	Date Utility Notified: July 3, 2017
Utility Number/Type: U 338-E	<input checked="" type="checkbox"/> E-Mailed to:
Advice Letter Number: 3616-E	AdviceTariffManager@sce.com ;
Date AL(s) Filed: June 13, 2017	Karyn.Gansecki@sce.com
Utility Contact Person: Russell G. Worden; Laura Genao	ED Staff Contact: Patrick Doherty ED Staff Email: PD1@cpuc.ca.gov
Utility Phone No.: (626) 302-4177	ED Staff Phone No.: (415) 703-5032

INITIAL SUSPENSION (up to 120 DAYS from the expiration of the initial review period)

The above-indicated AL is suspended for up to 120 days beginning July 13, 2017 for the reason noted below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by the Energy Division extends beyond the expiration of the initial suspension period, the AL will be automatically suspended for up to 180 days beyond the initial suspension period.

A Commission Resolution is Required to Dispose of the Advice Letter

Advice Letter Requests a Commission Order

Advice Letter Requires Staff Review

The expected duration of initial suspension period is 120 days

If you have any questions regarding this matter, please contact Patrick Doherty at PD1@cpuc.ca.gov or (415) 703-5032.

cc:
EDTariffUnit



9325 Sky Park Court
Suite 100
San Diego, CA 92123

main 858.244.1177
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www.energycenter.org

June 13, 2017

Advice No. 80
(Center for Sustainable Energy®)

Advice No. 3852-G/5089-E
(Pacific Gas and Electric Company –U 39 M)

Advice No. 3616-E
(Southern California Edison Company – U 338-E)

Advice No. 5151
(Southern California Gas Company – U 904-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Modifications to the Self-Generation Incentive Program to Incorporate California Contractor’s State License Board’s C-46 Solar Contractor License Classification into List of SGIP-Eligible Licenses for the Combined Installation of Solar Photovoltaics and Energy Storage.

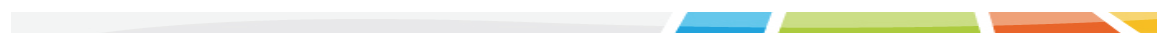
PURPOSE

The Center for Sustainable Energy® (CSE), on behalf of the Self-Generation Incentive Program (SGIP) Program Administrators (PAs),¹ hereby submits this advice filing to propose modifications to the SGIP Handbook to incorporate the California Contractor’s State License Board’s (CLSB) C-46 solar contractor license classification into the list of SGIP-eligible licenses for the combined installation of solar photovoltaics (PV) and energy storage.

BACKGROUND

The SGIP requires that all eligible systems are installed by a licensed California contractor in accordance with rules and regulations adopted by the CSLB. In 2005, the SGIP Handbook clarified that installation contractors must have an active A, B, or C-10 license, or a C-46 license for PV systems. However, when the California Solar Initiative (CSI) was established in

¹ The SGIP PAs are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and CSE in the service territory of San Diego Gas & Electric Company (SDG&E).



2006, the Commission limited SGIP eligibility to non-solar distributed generation projects. Thus, in 2007, the SGIP Handbook was modified to remove the C-46 solar contractor license classification.

In 2011, the Commission made major regulatory modifications to the SGIP, including the eligibility of stand-alone advanced energy storage projects. Decision (D.)11-09-015 clarified that energy storage technologies may be stand-alone, paired with another SGIP-eligible technology, or paired with solar PV. Furthermore, in 2016, D.16-06-055 ordered the SGIP PAs to prioritize energy storage projects paired with and charging from onsite renewable generators if applications received on the same day request more incentives than the remaining budget at the current incentive step.

Consequently, the SGIP has seen an increase in the number of SGIP energy storage applications paired with solar PV, many of which are developed by solar contractors. As such, it has come to the SGIP PAs' attention that the omission of the C-46 solar contractor license in the current SGIP Handbook may limit the participation of contractors eligible to install energy storage systems as part of a solar PV system installation. The SGIP PAs therefore propose to amend the SGIP Handbook to allow for C-46 license holders to perform such installations.

To clarify, this advice filing does not propose modifications to the installation of stand-alone storage systems. Energy storage systems that are not installed at the same time and in conjunction with solar PV are not eligible for the C-46 classification and must be installed by a contractor with an active A, B, or C-10 license.

PROPOSED AMENDMENTS TO THE SGIP HANDBOOK

This advice letter proposes the following Handbook change:

Affected Section:

5.4.2 Required Documentation for Proof of Project Milestone

All systems must be installed by an appropriately licensed California contractor in accordance with rules and regulations adopted by the State of California Contractors' State Licensing Board. Installation contractors must have an active A, B, or C-10 license, or a C-46 license for the combined installation of solar photovoltaics and energy storage.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2 and D.16-06-055, this Advice Letter is submitted with a Tier 2 designation.

PROTESTS

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than July 3, 2017, which is twenty (20) days after the filing of this Advice Letter. Protests should be submitted to:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Ave., 4th Floor
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Copies of the protest should also be sent to the attention of the Director, Energy Division, Room 4004, at the address shown above.

A copy of the protest should also be sent via e-mail and U.S. mail to the addresses below on the same date it is mailed or delivered to the Commission:

For CSE:
Sephra Ninow
Associate Director, Regulatory Affairs
Center for Sustainable Energy®
9325 Sky Park Court, Suite 100
San Diego, CA 92123
E-mail: sephra.ninow@energycenter.org

For SoCalGas:
Attn: Ray Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
E-mail: rortiz@SempraUtilities.com

For SCE:
Russell G. Worden
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770
Telephone: (626) 302-4177
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, CA 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For PG&E:
Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

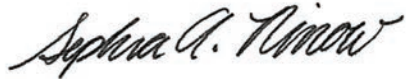
There are no restrictions as to who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

EFFECTIVE DATE

CSE requests that this Advice Letter become effective on regular notice, July 13, 2017, which is thirty (30) calendar days after the date of filing.

NOTICE

CSE is providing a copy of this Advice Letter to service list R.12-11-005.



Sephra A. Ninow, J.D.
Associate Director, Regulatory Affairs
Center for Sustainable Energy®

cc: Service List R.12-11-005

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. Center for Sustainable Energy® (CSE)

Utility type: N/A

ELC GAS

PLC HEAT WATER

Contact Person: Sephra Ninow

Phone #: (858) 244-1186

E-mail: sephra.ninow@energycenter.org

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Tier: 1 2 3

Advice Letter (AL) #: 80

Subject of AL: Proposed Modifications to the Self-Generation Incentive Program to Incorporate California Contractor's State License Board's (CLSB) C-46 Solar Contractor License Classification into List of SGIP-Eligible Licenses for the Combined Installation of Solar Photovoltaics (PV) and Energy Storage.

Keywords (choose from CPUC listing): Self Generation

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

N/A

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Resolution Required? Yes No

Requested effective date: July 13, 2017

No. of Tariff Sheets: 0

Estimated system annual revenue effect: (%): 0

Estimated system average rate effect (%): 0

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: Self-Generation Incentive Program: Incorporation of California Contractor's State License Board's (CLSB) C-46 Solar Contractor License Classification into List of SGIP-Eligible Licenses for the Combined Installation of Solar Photovoltaics (PV) and Energy Storage.

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov**

**Utility Info (including e-mail)
Sephra Ninow
Center for Sustainable Energy®
9325 Sky Park Court, Suite 100
San Diego, CA 92123
sephra.ninow@energycenter.org**

¹ Discuss in AL if more space is needed.

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

AT&T	Division of Ratepayer Advocates	Office of Ratepayer Advocates, Electricity Planning and Policy B
Albion Power Company	Don Pickett & Associates, Inc.	OnGrid Solar
Alcantar & Kahl LLP	Douglass & Liddell	Pacific Gas and Electric Company
Anderson & Poole	Downey & Brand	Praxair
Atlas ReFuel	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
BART	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Barkovich & Yap, Inc.	G. A. Krause & Assoc.	SCE
Bartle Wells Associates	GenOn Energy Inc.	SDG&E and SoCalGas
Braun Blaising McLaughlin & Smith, P.C.	GenOn Energy, Inc.	SPURR
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
CENERGY POWER	Green Charge Networks	Seattle City Light
CPUC	Green Power Institute	Sempra Energy (Socal Gas)
CalCom Solar	Hanna & Morton	Sempra Utilities
California Cotton Ginners & Growers Assn	ICF	SoCalGas
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company (SoCalGas)
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Leviton Manufacturing Co., Inc.	Sunshine Design
Center for Biological Diversity	Linde	Tecogen, Inc.
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	TerraVerde Renewable Partners
City of San Jose	Los Angeles Dept of Water & Power	TerraVerde Renewable Partners, LLC
Clean Power	MRW & Associates	Tiger Natural Gas, Inc.
Clean Power Research	Manatt Phelps Phillips	TransCanada
Coast Economic Consulting	Marin Energy Authority	Troutman Sanders LLP
Commercial Energy	McKenna Long & Aldridge LLP	Utility Cost Management
Cool Earth Solar, Inc.	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Crown Road Energy, LLC	NLine Energy, Inc.	Water and Energy Consulting
Davis Wright Tremaine LLP	NRG Solar	Wellhead Electric Company
Day Carter Murphy	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	ORA	YEP Energy
Dept of General Services	Office of Ratepayer Advocates	Yelp Energy