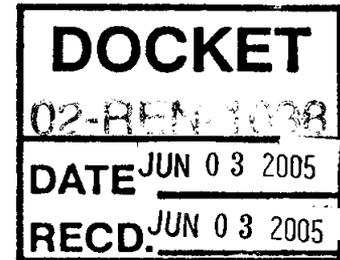


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June 3, 2005

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504



RE: Docket No. 02-REN-1038

Dear Commissioners:

San Diego Gas & Electric (SDG&E) and SoCalGas appreciated the opportunity to express their concerns regarding the proposed changes to the Emerging Renewables Program Guidebook. Specifically, we are concerned with the proposal to eliminate the requirement that program participants provide a utility letter of authorization in order to verify a system's approved interconnection to the utility distribution grid. In lieu of this change, we would offer to electronically submit the utility letter of authorization to the California Energy Commission (CEC) on behalf of the customer in order to expedite the transmittal process.

**Emerging Renewables Program Guidebook--
Letter of Authorization to Interconnect the System with the Utility**

SDG&E and SoCalGas support the current requirement that the customer submit the letter of authorization to interconnect the system with the utility before the CEC makes the rebate payment. This change will ensure that all systems comply with the California Electrical Code (based on the National Electric Code) and SDG&E's Service Standards. Safety is the number one priority for employees and customers of SDG&E and SoCalGas.

There have been instances in SDG&E's service territory where customers have installed photovoltaic systems without a building permit, or inspection by the authority having jurisdiction, and without notifying the utility. If incorrectly installed, there is a possibility during an outage that the system may feed back onto the grid causing serious injury or worse to our utility workers.

Current Inter-Connection Process

SDG&E and SoCalGas realize that our customers are most anxious to receive their incentives as soon as possible. Consequently, our inter-connection team has worked diligently to ensure the inter-connection process is streamlined without compromising safety.

The inter-connection process is as follows:

- Customer submits inter-connection paperwork to SDG&E. We recommend it be sent at least 15 working days before they plan to inter-connect to avoid delays and to expedite the process.
- SDG&E reviews the paperwork and performs the system protection analysis.

- Once the system has been installed, the Building Inspector makes sure the system meets the California Electrical Code, and upon acceptance, releases the electrical inspection clearance to SDG&E.
- Upon receipt of the inspection release from the authority having jurisdiction, SDG&E's Service Standards and Self-Generation group will field inspect the project within 2-3 business days to ensure SDG&E's Service Standards are met. Namely, they inspect the customer's AC disconnect for utility operation; make sure the utility's transformer serving the customer is mapped properly; check that the correct placards are posted for the safety of fire department and utility workers; and ensure the existing meter is capable of registering bi-directional current flow.
- Provided everything is in order and the inter-connection paperwork is correct, the letter authorizing inter-connection (parallel operation) with the utility will be faxed to the customer (or contractor) the following business day.

We believe this process has been fair and has worked well for our customers and the safety of our employees. If the purpose of the proposed change is to reduce the amount of time it takes for the customer to provide the CEC with the utility letter of authorization, we would offer to electronically submit the utility letter of authorization to the CEC on the same day on the customer's behalf.

Again, thank you for the opportunity to provide comments on this workshop. If you should have any questions regarding these comments, please contact me at (916) 492-4244.

Sincerely,

Bernie Orozco