

**DOCKETED**

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## **SDG&E Response to CEC RFI on Solar Equipment Lists**

Please find SDG&E's comments on the CEC's Request for Information on Solar Equipment Lists attached.

*Additional submitted attachment is included below.*



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California Energy Commission  
Docket Office  
Docket No. 18-SOLAR-01  
715 P Street  
Sacramento, CA 95814

**SUBJECT: San Diego Gas & Electric Company Comments on the Request for Information on CEC Solar Equipment Lists (Docket No. 18-SOLAR-01)**

San Diego Gas & Electric Company (“SDG&E”) appreciates the opportunity to provide comments in response to the California Energy Commission (“CEC”) Request for Information on CEC Solar Equipment Lists (“RFI”) released on March 14, 2023. SDG&E values the CEC’s maintenance of the Solar Equipment Lists, which ensures high-quality solar equipment in interconnection application reviews. This centralized and regularly updated resource promotes consistency and efficiency across the solar industry. The lists are crucial for maintaining uniformity among utilities and streamlining the interconnection process. Input on specific questions raised in the RFI is provided below.

**SDG&E Responses to Questions Posed in the RFI**

**1. What entity, if any, do you represent or are you affiliated with?**

San Diego Gas & Electric Company

**2. What is your/your organization’s primary use of the Solar Equipment Lists?**

SDG&E utilizes the CEC’s Solar Equipment Lists in the review of applications for the interconnection of generation facilities with SDG&E’s electric system.

**3. How often do you download or reference the Solar Equipment Lists from the Solar Equipment Lists website at**

**<https://solarequipment.energy.ca.gov/Home/Index?>**

- a. Less than 1 time per month
- b. 1 to 3 times per month
- c. More than 3 times per month
- d. Other - please explain:

Other - This information is used daily by SDG&E.

**4. Please provide information on how the Solar Equipment Lists assist you/your organization with everyday business needs:**

**i. How do they integrate with your operations?**

The list is integrated within SDG&E's Customer Generation team portal (DIIS).

**ii. How would you describe the value of the lists to your efforts?**

The lists are extremely valuable, making it easier for SDG&E to review applications for accuracy and consistency.

**iii. If applicable, approximately how many interconnection applications/permits to operate do you process, on a monthly basis, using the data on the Solar Equipment Lists?**

Approximately 4,000 applications per month are processed by using information on the Solar Equipment Lists.

**5. Roughly how much time do you save on a weekly or monthly basis by using the data on the Solar Equipment Lists, as opposed to not having the lists as a reference?**

SDG&E estimates that not having the lists as a reference would reduce SDG&E's ability to process 4,000 applications per month to 1,000 applications per month.

**6. Is there a format that would improve the effectiveness of the lists or ability to use them?**

No, the current excel CSV file format works well with SDG&E's DIIS database tool.

**7. Can you substitute the data from the Solar Equipment Lists with another data source? How would your program(s) be impacted without this resource?**

SDG&E does not have an alternative data source and would need to update all the information manually. The data from the Solar Equipment Lists plays a crucial role in maintaining uniformity among all the Investor-Owned Utilities. Without this resource, SDG&E's efficiency in processing applications would be significantly impacted, leading to potential delays and inconsistencies in the review and approval process.

**8. As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?**

N/A

**9. Please share any other feedback you would like us to consider.**

SDG&E believes that using a centralized list (the CEC's lists) is the most efficient and effective way to coordinate and have an orderly queue to add equipment to the list.

**Conclusion**

Thank you for your consideration of these comments. SDG&E strongly supports the CEC's ongoing efforts to maintain the Solar Equipment Lists, which play a vital role in promoting high-quality solar equipment and streamlined interconnection processes. We welcome the opportunity to further discuss this input with CEC staff. Please contact me if you have any questions or are interested in additional information.

Sincerely,

*/s/ Sarah M. Taheri*

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Regulatory Affairs Manager