



SOUTHERN CALIFORNIA
EDISON
An EDISON INTERNATIONAL Company

December 3, 2004

DOCKET	
02-REN-1038	
DATE	DEC 03 2004
RECD.	DEC 06 2004

California Energy Commission
Re: Docket No. 02-REN-1038
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

Dear Commission:

Re: Southern California Edison's Comments in Support of the
Proposed Guidebook Changes to the Emerging Renewables Program

Pursuant to the proposed changes to the Emerging Renewables Program, Southern California Edison (SCE) would like to reaffirm the Commission's Proposed Guidebook Changes to Section 7 (System Interconnection with Utility Grid) stating: *"the applicant must demonstrate that the system is interconnected to the utility distribution grid and that the utility has approved this interconnection for the system's operation at the site of installation. The applicant must demonstrate this by submitting a letter of authorization to interconnect the system from the utility."*

SCE believes that requiring the applicant to obtain the utility's Approval Letter for interconnection, prior to receiving the rebate payment, is very prudent and will encourage more effective use of ratepayer money. SCE further believes this change will promote compliance with the utility's interconnection process and will deter unauthorized interconnections.

SCE would like to thank you for giving us the opportunity to comment on the Proposed Guidebook Changes, as referred to in Section 7.

If you have any questions, please call me at (916) 441-2369.

Sincerely,

Manuel Alvarez

cc: Commissioner John L. Geesman
Commissioner Jackalyne Pfannenstiel
Tony Brasil
Kate Zocchetti

to the expiration date. In addition, if an electric utility bill is not provided, the applicant must provide a separate letter from a qualified architect, engineer, or electrical contractor (C-10 licensed) that identifies the expected electricity consumption at the site and verifies that the consumption will satisfy program requirements for system size.

5.7. System Interconnection with Utility Grid

The applicant must demonstrate that the system is interconnected to the utility distribution grid and that the utility has approved this interconnection for the system's operation at the site of installation.— The applicant must demonstrate this by submitting a letter of authorization to interconnect the system from the utility.— ~~The rebate Ppayment Claim Form -may be filed made prior to obtaining the utility letter of authorization, but the rebate payment will not be made until the letter of authorization is submitted to the Energy Commission. if the applicant submits written authorization to the Energy Commission which gives permission to the applicant's utility to exchange applicant information with the Energy Commission to verify compliance with the interconnection requirements. Forms for this purpose may be obtained directly from the applicant's utility. The authorization may be provided by submitting a completed California Public Utilities Commission form "Authorization to Receive Customer Information or Act on a Customer's Behalf." A customer's authorization must remain in effect for the lesser of three years or the term of the ERP.~~

~~If the site of installation was a new facility without electrical service when the reservation request was submitted, a copy of the applicant's utility statement or other proof from the utility must be submitted before payment may be made. Other proof may include written confirmation from the utility that a meter has been set at the site and verifying that the site had electrical service prior to the reservation expiration date.~~

~~In addition, applicants must authorize the Energy Commission to exchange applicant information with the applicant's utility if necessary to verify compliance with these interconnection and program requirements.— **To verify compliance with the interconnection requirements as well as the ERP requirements, the Energy Commission must exchange applicant information with the applicant's utility.** By applying for program funding, a reservation, applicants authorize the Energy Commission during the term of the ERP to exchange applicant information with the applicant's utility for these purposes. In order to verify compliance with the interconnection and program requirements.~~

8. Payee Data Record (Form STD-204)

If the data provided in a previously submitted STD-204 has changed, the payee must notify the Energy Commission and submit a new STD-204. If the payee originally identified has changed, an STD-204 form must be submitted (if the new payee was not

From: <Tambre.Doyle@sce.com>
To: <docket@energy.state.ca.us>
Date: Mon, Dec 6, 2004 8:48 AM
Subject: Docket No. 02-REN-1038 - SCE's Comments

Attached please find SCE's Comments in Support of the Proposed Guidebook Changes to the Emerging Renewables Program for Docket No. 02-REN-1038.

(See attached file: 120304RenewablesComments.doc) (See attached file: AR-M350_20041203_162952.tif)

~~~~~  
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**CC:** <jgeesman@energy.state.ca.us>, <jpfannen@energy.state.ca.us>, <tbrasil@energy.state.ca.us>, <kzocchet@energy.state.ca.us>