



**Pacific Gas and
Electric Company**

December 3, 2004

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02-REN-1038	
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California Energy Commission
1516 Ninth Street
Docket Unit, MS-4
Sacramento, CA 95814-5504
e-mail: docket@energy.state.ca.us

Re: Pacific Gas and Electric Company's Comments to Proposed Changes to the Emerging Renewables Program Guidebook Regarding Rebate Payment in Docket No. 02-REN-1038

Dear Commission:

Pacific Gas and Electric Company (PG&E) submits these written comments in response to the California Energy Commission's Renewables Committee's (Committee) request for public comment on a proposal to change the pilot Performance-Based Incentive (PBI) program guidelines and the Emerging Renewables Program (ERP) Guidebook (Guidebook) to require applicants to provide a copy of the utility "approval to interconnect letter" in order to obtain their rebate payment. As provided in the email instructions from Tony Brasil, Supervisor, Emerging Renewables Program, these comments are being sent via electronic mail by close of business, December 3, 2004.

PG&E wishes to thank the Commission for the opportunity to comment on the ERP Guidebook and the PBI program.

In the Guidebook page 22 - Chapter V, Section A.7. *System Interconnection with Utility Grid*, the Committee is proposing the following language with changes:

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 Payment Claim Form may be filed 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. 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, applicants authorize the Energy Commission during the term of the ERP to exchange applicant information with the applicant's utility for these purposes.

PG&E supports this language change to the ERP Guidebook requiring the applicant to submit the utility letter of authorization to interconnect prior to CEC payment of the rebate. This rule change will help ensure that customers fully complete the interconnection process with their utility in a timely manner.

Currently, some of PG&E's net energy metering applicants stop short of completing the interconnection authorization process once they receive their rebate money. This problem creates additional work for the utility and increases the potential for unauthorized interconnections that have not been fully reviewed or approved. By tying the rebate payment to completion of the interconnection process, the CEC will give customers a strong incentive to provide documents and meet interconnection requirements in a timely manner. The end result will be improved application to approval turn around times, a benefit to both the utility and customers.

PG&E also recommends that this requirement be included in the Performance Based Incentive (PBI) program (Chapter VIII in the Guidebook). Chapter VIII states that the PBI program uses the same guidelines as those for the ERP shown in Chapter IV. PG&E suggests changing this reference to Chapter V of the ERP Guidebook since the proposed language requiring a utility letter of authorization prior to payment of the rebate is shown in Chapter V.

If you have any question, please contact me.

Sincerely,

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Hirsch, Harold

From: Hirsch, Harold
Sent: Friday, December 03, 2004 3:52 PM
To: 'docket@energy.state.ca.us'
Cc: 'Tony Brasil'; Treleven, Kathleen
Subject: PG&E's Comments to Proposed Changes to the Emerging Renewables Program Guidebook Regarding Rebate Payment in Docket No. 02-REN-1038

Attached, please find Pacific Gas and Electric Company's Comments to Proposed Changes to the Emerging Renewables Program Guidebook Regarding Rebate Payment in Docket No. 02-REN-1038.

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