STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Edmund G. Brown Jr., *Governor*

July 11, 2012

Advice Letter 3170-G-A/3763-E-A

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Supplemental - Notification of the Creation of a New Affiliate

Dear Mr. Cherry:

Advice Letter 3170-G-A/3763-E-A is effective June 25, 2012 per Resolution G-3461.

Sincerely,

Edward Randolph

Edward F. Randolph, Director
Energy Division

Pacific Gas and Electric Company

Jane K. Yura
Vice President
Regulation and Rates

Pacific Gas and Electric Company
77 Beale St., Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177

Fax: 415.973.6520

December 17, 2010

Advice 3170-G-A/3763-E-A
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: **Supplemental - Notification of the Creation of a New Affiliate**

Purpose

In accordance with Decision 06-12-029, Appendix A, Rule VI. B--New Affiliate Compliance Plans, Pacific Gas and Electric Company ("PG&E") hereby notifies the Commission of the formation of a new affiliate under Rule II.B of the Affiliate Transaction Rules.

Rule VI. B. requires that:

> Upon creation of a new affiliate, which is addressed by these Rules, the utility shall immediately notify the Commission of the creation of the new affiliate, as well as posting notice on its electronic bulletin board. No later than 60 days after the creation of this affiliate, the utility shall file an advice letter with the Energy Division of the Commission, served on parties to this proceeding. The advice letter shall demonstrate how the utility will implement these Rules with respect to the new affiliate.

This supplemental filing cancels and supersedes Advice 3170-G/3763-E in its entirety.

Sequoia Pacific Solar I, LLC

On September 21, 2010, PG&E Corporation's subsidiary, Pacific Energy Capital III, LLC ("PEC III"), acquired a membership interest in Sequoia Pacific Solar I, LLC, a Delaware limited liability company ("Sequoia Pacific"). Sequoia Pacific is an affiliate of Pacific Gas and Electric Company and it is subject to the Affiliate Transaction Rules under Rule II.B thereof because it is active in the electric energy business as a provider of residential rooftop solar energy installations. PEC III's investment in Sequoia Pacific is funded by PG&E Corporation shareholders.

The management of Sequoia Pacific is as follows:

Managing Member:	Sequoia Pacific Member I, LLC
Members:	PEC III Sequoia Pacific Member I, LLC

Description of the Investment

Under Sequoia Pacific's limited liability company agreement, PEC III will provide $120 million in capital for approximately 23 megawatts of residential and commercial solar energy installations within and outside of PG&E's service territory in 2010 and 2011. As the owner of the installations, Sequoia Pacific will be entitled to the related host customer payments. PEC III will receive a share of the cash flows generated by Sequoia Pacific as well as federal investment tax credits and other tax benefits. PEC III's investment in Sequoia Pacific is of a type usually characterized as a "tax equity investment."

The managing member of Sequoia Pacific will be Sequoia Pacific Member I, LLC (the Managing Member), an affiliate of SolarCity Corporation ("SolarCity") and a provider of residential solar sales, marketing, financing and monitoring services. The Managing Member will also manage the solar energy projects. The host customers will receive the energy generated by the projects and those customers who reside in PG&E's service territory will participate in PG&E's Net Energy Metering Program.

Sequoia Pacific also has a Maintenance Services Agreement with SolarCity, whereunder host customers will work directly with SolarCity employees for billing, installation and upkeep of their PV systems. Thus, under the two agreements, neither Sequoia Pacific nor PEC III will have any responsibility for day-to-day management or operation of the PV systems, nor will they interact directly with the host customers or with PG&E. Further, because SolarCity obtains tax equity capital from multiple investors, neither SolarCity nor the host customers to whom SolarCity sell will know at the time of contract execution whether or not capital from an affiliate of PG&E will be used to acquire the system.

The Sequoia Pacific transaction was initiated and conducted independently from PG&E and in full compliance with the Affiliate Transaction Rules.

Continued Compliance With The Affiliate Transaction Rules

PG&E has a strong Affiliate Transaction Rules compliance plan in place that, combined with additional targeted training provided in connection with PG&E Corporation's tax equity investments, will ensure continued compliance with the Affiliate Transaction Rules. On June 30, 2010, in Advice Letter 3131-G/3694-E, PG&E filed its Affiliate Transaction Rules Compliance Plan with the Commission. Advice 3131-G/3694-E details PG&E's plan for compliance with the Affiliate Transaction Rules. PG&E employees are directed to understand and comply with PG&E's Affiliated Transaction Company Procedures, which can be found on PG&E's internal web site. A communication was issued to all PG&E employees directing them to comply with the Affiliate Transaction Rules and with the company's procedures. In addition, PG&E provides training to targeted groups affected by particular rules. The annual audits performed by the independent auditors through 2006[1] have confirmed that PG&E's procedures have been effective.

The following discussion addresses particular rules, their applicability to Sequoia Pacific, and how PG&E will address compliance with the rules.

Rule II – Applicability

Rule I.A of the Affiliate Transaction Rules define "affiliate" as "any person, corporation, utility, partnership, or other entity 5 percent or more of whose outstanding securities are owned, controlled, or held with power to vote, directly or indirectly either by a utility or any of its subsidiaries, or by that utility's controlling corporation." Rule II makes the rules applicable "to all utility transactions with affiliates engaging in the provision of a product that uses gas or electricity or the provision of services that relate to the use of gas or electricity." PEC III is a wholly-owned subsidiary of PG&E Corporation, which in turn owns PG&E, and PEC III owns a greater than 5 percent voting interest in Sequoia Pacific. Sequoia Pacific is thus an "affiliate." Through power purchase agreements and leases, Sequoia Pacific will be providing PV systems to residential customers and will thus be engaging in the provision of a service that relates to the use of electricity. The Affiliate Transaction Rules will therefore apply to any transactions between Sequoia Pacific and PG&E.

PEC III's investment in Sequoia Pacific is a passive financial investment in that PEC III will not engage in the day-to-day management of either Sequoia Pacific or

[1] 2006 is the last year for which Pacific Gas and Electric Company had an independent audit of its Affiliate Transaction Rules compliance; independent biennial Commission-directed audits are pending.

the related customer solar energy systems. Moreover, most host customers will not know of the affiliate relationship between Sequoia Pacific and PG&E, as they will be exposed solely to the brand of SolarCity in connection with their solar energy systems.

Separate from this transaction, PG&E Corporation has warrant rights that allow it to acquire approximately a two percent equity interest in SolarCity under certain circumstances. PG&E Corporation presently has no ownership interest or control over SolarCity, however, and, even if it ultimately exercises its warrant rights, it will only hold approximately a two percent interest, and SolarCity will still not be an "affiliate" within the meaning of Rule I.A.

Rule III - Nondiscrimination

Rule III.A prohibits a utility from (1) representing that, as a result of the affiliation with the utility, its affiliates or customers of its affiliates will receive any different treatment by the utility than the treatment the utility provides to other, unaffiliated companies or their customers, or (2) providing affiliates, or customers of affiliates, any preference over non-affiliated suppliers or their customers in the provision of services provided by the utility. In the case of Sequoia Pacific, PG&E, in its role as Program Administrator for CSI projects located in its service territory, will be providing certain standardized CSI services to Sequoia Pacific provided for in the Commission-approved CSI Program Handbook. PG&E has policies and procedures in place to ensure compliance with Rule III.A.

In addition to the general communication issued to PG&E employees and to regular compliance training, upon execution of the initial SolarCity agreements for tax equity financing, PG&E sent a communication to employees responsible for managing CSI advising them about Rule II.B affiliates and reminding them to comply with the Affiliate Transaction Rules with emphasis on not providing preferential treatment. All such employees were also required to take an additional on-line compliance training course in 2010 after the first instance of a PG&E affiliate investing in a company performing services related to CSI. In addition, PG&E provided targeted one-on-one compliance counseling to key employees responsible for administering CSI to ensure that PG&E does not provide any preferential treatment.

Rule III.B limits transactions between a utility and its affiliates to tariffed products and services, to the sale of goods, property, products or services made generally available by the utility or affiliate to all market participants through an open, competitive bidding process, to the provision of information made generally available by the utility to all market participants, to Commission approved resource procurement by the utility, or to approved joint purchases or corporate support. In the case of Sequoia Pacific, any transactions between Sequoia Pacific and Pacific Gas and Electric Company will be pursuant to the Commission-approved CSI

Program Handbook available to all market participants. Pacific Gas and Electric Company will only provide to Sequoia Pacific (or to SolarCity, acting as agent for Sequoia Pacific) the same information made generally available to all CSI participants. The procedures detailed in Advice 3131-G/3694-E are designed to ensure compliance with this rule and the Commission-ordered independent auditor's annual audits through 2006 have confirmed that these procedures are effective. Pacific Gas and Electric Company provided additional training to employees responsible for administering CSI to ensure that they understand and comply with this rule.

Rule III.C prohibits tying utility services to services provided by affiliates. No PG&E customer will be required to install systems associated with Sequoia Pacific leases or power purchase agreements in order to receive any services from PG&E.

Rules III.D and III.E prohibit utilities from assigning customers to affiliates, providing leads to affiliates, soliciting business on behalf of affiliates, acquiring information in behalf of affiliates, sharing nonpublic market information with affiliates, requesting authorization from customers to pass on customer information exclusively to affiliates, or giving the appearance that the utility or affiliate speak on behalf of each other. The limited nature of any interaction between Sequoia Pacific and PG&E presents little danger of noncompliance with these rules. That said, PG&E's Utility Affiliated Transaction Company Procedures and associated employee training are designed to ensure compliance with these rules. The specific training PG&E provided to employees responsible for managing the CSI program was designed to ensure that they provide no preferential treatment.

Rule IV - Disclosure and Information

Rule IV.A prohibits a utility from providing customer information to third parties without affirmative customer written consent, and then prohibits the utility from providing discriminatory access to such information to affiliates. Sequoia Pacific's participation in the CSI program will not involve access to PG&E customer data, and thus does not present a danger of discriminatory access. That said, PG&E's Utility Affiliated Transaction Company Procedures and associated employee training are designed to ensure compliance with these rules, and employees responsible for managing the CSI program received additional training in affiliate rules compliance with respect to solar energy affiliate relationships.

Rule IV.B. prohibits a utility from providing non-customer specific non-public information to its affiliates. Sequoia Pacific's participation in the CSI program will neither require nor benefit from acquisition of non-public utility information. Regardless, PG&E's Utility Affiliated Transaction Company Procedures and associated employee training are designed to ensure compliance with this rule.

Rule IV.C prohibits utilities from providing lists of service providers to customers except by request of the customer or as otherwise authorized by the Commission. This rule applies to any list, whether or not the list includes utility affiliates. PG&E employees responsible for managing the CSI program and customer service employees are thus already trained to comply with this rule.

Rule IV.D prohibits the utility from providing non-public information received from unaffiliated suppliers to its affiliates without prior written authorization. PG&E provided additional training for employees responsible for managing CSI to ensure that they do not provide non-public information received from other CSI suppliers to solar energy affiliates.

Rule IV.E prohibits utilities from providing "customer advice or assistance with regard to its affiliates or other service providers." Because this rule applies to all service providers, whether or not they are an affiliate, PG&E employees responsible for managing the CSI program and customer service employees are already trained to comply with this rule. In addition, as discussed above, CSI employees received additional compliance training after execution of the initial SolarCity agreements.

Rules IV.F and IV.G require utilities to maintain contemporaneous records documenting all tariffed and non-tariffed transactions with its affiliates and to maintain such records for a minimum of three years, and to maintain a record of all contracts and related bids for the provision of work, products or services between the utility and its affiliates for at least three years. PG&E employees are trained to comply with this rule, and those employees responsible for managing CSI in particular have been trained to comply with these rules.

Rule V - Separation

Rule V requires that a utility and its affiliates be separate corporate entities, keep separate books and records, maintain such books and records open for examination by the Commission and its staff consistent with the provisions of Public Utilities Code Sections 314 and 701, and not share plant, facilities, equipment or costs, other than authorized shared corporate support services. Sequoia Pacific is and will remain in full compliance with these rules. Sequoia Pacific is a separate Delaware limited liability company registered with the California Secretary of State. Sequoia Pacific maintains its own books and records which are available for examination by the Commission as required by law. Sequoia Pacific's headquarters are separate from PG&E, and Sequoia Pacific shares no facilities, equipment or costs with PG&E other than the cost of permitted shared support services authorized by the Affiliate Transaction Rules.

Rule V.D prohibits certain joint purchases by a utility and its affiliate. Because SolarCity, not Sequoia Pacific, will be managing the solar energy projects, Sequoia Pacific will have no need to, and will not, make any joint purchases with PG&E.

Rule V.E limits the type of corporate support that an affiliate may share with a utility. Sequoia Pacific will receive certain corporate support services from PG&E Corporation and from PG&E. PG&E has detailed procedures in place to ensure compliance with Rule V.E. Moreover, shared support services have been described and subject to discovery in each of PG&E's recent general rate cases. Sequoia Pacific will only receive the same types of corporate support services that PG&E Corporation and PG&E have historically provided to other Rule II.B affiliates in compliance with this rule (*e.g.*, legal, financial planning, shareholder services, etc.).

Rule V.F prohibits a utility from trading upon, promoting or advertising its affiliate's affiliation with the utility, or allowing affiliates to use the utility's name or logo unless the affiliate includes the required disclaimer. Because Sequoia Pacific will have no role in managing or operating the PV facilities, Sequoia Pacific will not engage in any advertising or promotion, and will thus have no opportunity to violate this rule. In addition, PG&E employees will have no involvement with Sequoia Pacific aside from administration of the CSI program and will not participate in joint advertising or marketing, joint sales calls, trade shows or other events.

Rule V.G. prohibits sharing employees, except in connection with approved corporate support. Sequoia Pacific will not employ anyone who is also employed by PG&E.

Rule V.H requires that any transfer of goods or services from an affiliate to a utility be priced at no more than fair market value. The only services Sequoia Pacific may receive from PG&E (other than authorized shared corporate support services) will be pursuant to the approved CSI Program Handbook and are thus deemed to be at fair market value under Rule V.H.3. Sequoia Pacific will provide no goods or services to PG&E.

PG&E does not believe that the transactions it may engage in with Sequoia Pacific as CSI program administrator implicate any other Affiliate Transaction Rules.

Additional Information

PG&E Corporation also changed the name of PG&E Ventures, Inc. to PCG Capital Inc. PCG Capital Inc. is a Rule II.B. affiliate and has not changed its business description.

No unusual or unique circumstances exist that would require special affiliate transactions rule implementation measures.

Questions regarding this affiliate should be addressed to Megan Janis, Director, Compliance and Ethics at (415) 973-8190.

PG&E has previously notified Commission staff and posted notice of the formation of these affiliates on its affiliate transaction World Wide Web site at: http://www.pge.com/about/rates/affiliate/.

This filing will not increase any other rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **January 6, 2011**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@cpuc.ca.gov

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

The protest also should be sent via U.S. Mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this advice filing become effective on **November 22, 2010**. PG&E submits this as a Tier 1 filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for A.09-02-019, R.05-10-030, R.08-03-008, and R.10-05-004**.** Address changes to the General Order 96-B service list and all electronic approvals should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs.

Jane Yura /lmt

Vice President – Regulation and Rates

cc: Service Lists A.09-02-019, R.05-10-030, R.08-03-008, R.10-05-004

Attachments

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. **Pacific Gas and Electric Company (ID U39 M)**	
Utility type: ☑ ELC ☑ GAS ☐ PLC ☐ HEAT ☐ WATER	Contact Person: Linda Tom-Martinez Phone #: (415) 973-4612 E-mail: lmt1@pge.com
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water	(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3170-G-A/3763-E-A** **Tier: 1**

Subject of AL: Supplemental - Notification of the Creation of a New Affiliate (Sequoia Pacific Solar I, LLC)

Keywords (choose from CPUC listing): Affiliate, Compliance

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☑ One-Time ☐ Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-12-029

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 AL[1]: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

Confidential information will be made available to those who have executed a nondisclosure agreement: ☐ Yes ☐ No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes ☐ ☑No

Requested effective date: **November 22, 2010** No. of tariff sheets:

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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:

Service affected and changes proposed[1]:

Pending advice letters that revise the same tariff sheets:

Protests, dispositions, 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
Tariff Files, Room 4005
DMS Branch
505 Van Ness Ave.,
San Francisco, CA 94102
jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Jane Yura
Vice President, Regulation and Rates
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

Advice 3170-G-A/3763-E-A
Appendix A

Pacific Gas and Electric CSI Program Administration Procedures

In addition to following the CSI Program Handbook requirements, PG&E has created a detailed Policies and Procedures Manual that our employees use as a guideline to review and process Applications. The CSI Program Handbook was used as the main point of reference when PG&E created the Policies and Procedures Manual.

To ensure that projects are reviewed in an equitable way, all Reservation Requests (applications) and Incentive Claims are date stamped and reviewed in the order they are received, project statuses, milestones and expiration dates are managed through PowerClerk (Statewide Application Database), projects are selected for inspections based on the criteria outlined in the CSI Program Handbook and SB1 and Infractions and Failures are issued in accordance with the CSI Handbook.

Reservations and Incentive Claims

Both Reservation Requests and Incentive Claims are reviewed based on the date received. Processing Team members and Project Managers review projects to ensure that required documents have been submitted in accordance of the CSI Handbook. Projects that do not have all the required documents or do not meet the program eligibility requirements are suspended or rejected. Notification emails are sent to Applicants outlining the required documents and 20 calendar days are provided to the Applicant to send in the requested documents. Projects that do not meet the CSI eligibility requirements are rejected. PG&E's speed of processing reservation requests is subject to objective audit.

Incentive Claim documentation is reviewed by the CSI Operations Processing Team, payments are requested by the CSI Operations Project Managers, payments are approved by the CSI Products Team, checks are requested by the CSI Operations Payment Team and, finally, the checks are cut in West Sacramento.

Project Managers on the CSI Operations Team are responsible for ensuring the Quality Control (QC) of confirmed (reserved) reservations and incentive claim payment requests. At a minimum, every 1 in 3 confirmed reservations are QC'd by a Project Manager, all Incentive Claims are QC'd by the Project Manager for accuracy and payments are approved by a Project Manager on the CSI Products Team.

Project Inspections

All Incentive Claims received will be checked to determine if the Applicant needs to be pulled for inspection. As required by the CSI Program Handbook, onsite field inspections are performed for the first two Incentive Claim Forms submitted by each new Applicant and/or Solar Contractor. After the completion of two successful field inspections, each Applicant will have a minimum 1 in 7 projects inspected in the program overall, but each Program Administrator (PA) may inspect more projects from any particular Applicant or Solar Contractor. To maintain an overall 1 in 7 ratio, we ensure that the overall inspection rate is above 14%. After the first two

successful inspections for a particular Applicant or Solar Contractor, future projects are randomly inspected. Each Applicant's projects are selected for inspection based on the number of applications they have submitted. The inspection percentages of inspected projects for newer Applicants and for those who are placed on probation or removed from the program are higher. If an Applicant or Contractor is removed from the program, 100% of their remaining projects will be inspected. For Applicants or Contractors that are placed on probation up to 100% of their projects are inspected and the rate is collectively determined by the CSI PAs. PG&E's rate of inspection is subject to objective audit.

The California Public Utilities Commission (CPUC) requires that all system inspection visits be performed by trained personnel or contractors. PG&E has hired two vendors to perform CSI onsite inspections: EMCOR and kW Engineering.

Section 4.9.1.1 of the CSI Program Handbook outlines the key project components that are reviewed during the onsite field inspection. The inspectors will verify the System is installed in accordance with information provided on the Incentive Claim documentation, and in compliance with CSI handbook rules. Section 4.9.1.2 of the CSI Program Handbook outlines the acceptable range for key project components reviewed during the onsite inspection. In order for a project to pass the inspection, the results must fall within the tolerances outlined in Section 4.9.1.2 of the CSI Program Handbook: Tilt ± 3º, Azimuth ± 5º and Summer Shading (May-October) ± 5%. If applicable, an infraction or failure as defined in Sections 4.9.2.1 and 4.9.2.2 will be issued to the appropriate party if the onsite field inspection results in an incentive amount that is 5% greater or below the incentive identified on the original Incentive Claim Form.

Probation/Suspension

Decisions to place a contractor on probation or suspension are made collectively by PG&E, the other PAs and Energy Division. If it is determined that an Applicant, Solar Contractor, System Owner, Seller, and/or Host Customer is placed on probation or disqualified from participating in the CSI program because of more than the acceptable number of failures based on the company's size as outlined in Section 4.10 of the CSI Program Handbook, the program participant has an opportunity to appeal to the PAs and the CPUC.

In June of this year the CSI PAs also added a Dispute Resolution (Section 4.10.4) process to the CSI Program Handbook. The Dispute Resolution process provides an unbiased method for the CSI Program participant to appeal in writing to the PAs regarding notification of a sanction. To appeal the notification, the disqualified entity must first contact the appropriate PA within 30 days to discuss the issue. If the disqualified entity has new information to provide the PA, then it must be provided to the PA within 30 days. If the disqualified entity and the PA cannot resolve the dispute, then the disqualified entity can file a complaint using the CPUC's Formal Complaint process. Information on the formal Complaint process is available through the Public Advisor's Office at the CPUC or on CPUC's website.

In accordance with the CSI Program Handbook, Section 4.6.2, the CSI PAs have provided extensions to projects under extenuating circumstances that have shown substantial progress.

Extensions provided outside of the CSI Program Handbook guidelines have been collectively granted by the CPUC and other CSI PAs (CCSE and SCE).

Interconnection Process

PG&E enters interconnection applications into ENOS, the work management system, the day they are received, in the order in which they are received.

An application package is "anticipated to be" complete if it includes (1) the interconnection application and agreement, (2) an electric single line diagram and (3) a final and approved building permit. If the application package is "anticipated to be" complete, it is placed in a file for processing in the order in which the application was received. If the application is not complete, it is placed in a pending file until any missing items are received. Once the applicant submits all of the required documentation for a previously submitted incomplete application, the customer project is then filed for processing based on the date the final and approved building permit is received.

The complete project applications are batched based on the date they are received and, within each batch, in the order received. Applications are processed in chronological order, *i.e.*, when a batch is completed, the next most recent batch is processed, and, within each batch, applications are processed in the order in which complete packages were received. Processing involves entering all of the information into ENOS and making a determination as to whether the needed customer information is complete and accurate. PG&E works with the contractor and customer to resolve any outstanding issues. PG&E then releases the application for engineering review in accordance with Electric Rule 21.

An engineering review is also performed in the order received by the local engineering office. Engineering review typically takes up to about two business days without complications.

Once the project passes the engineering review, the project is released (through ENOS) to the appropriate Field Metering Services where a customer field tag for installation of a bi-directional meter is generated. The tags are by customer address and do not identify the contractor/installer. Field Metering Services then has flexibility to schedule the meter installation based on business efficiencies. Installation typically takes between seven and ten business days.

Marketing

Neither SolarCity nor SunRun are affiliated with PG&E. To the extent that the Utility learns that SunRun or SolarCity attempt to use Utility trademarks, or that their installers falsely claim that they represent the Utility or are otherwise associated with the Utility, the Utility would respond in the same manner that it does when any third party makes such false claims. The Utility has various procedures in place to monitor and take action (as appropriate) regarding potential unauthorized use of the Utility's name and logo by third parties. The procedures examine, among other things, incorrect claims of affiliation with the Utility.

The company gathers information regarding potential unauthorized use by (1) investigating reports of potential unauthorized use submitted by employees and other parties (such as Utility contractors and customers) and (2) reviewing regular periodic reports that list new trademark

registrations and new internet domain names incorporating “pge.” If the Utility discovers that a third party is using the Utility name or logo inaccurately or without authorization, the Utility’s responses can range from informally asking the third party to stop the unauthorized use to formal litigation in state or federal court or at the international tribunal for resolving internet disputes.

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

Alcantar & Kahl LLP
Ameresco
Anderson & Poole
Arizona Public Service Company
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Bloomberg
Bloomberg New Energy Finance
Boston Properties
Braun Blaising McLaughlin, P.C.
Brookfield Renewable Power
CA Bldg Industry Association
CLECA Law Office
CSC Energy Services
California Cotton Ginners & Growers Assn
California Energy Commission
California League of Food Processors
California Public Utilities Commission
Calpine
Casner, Steve
Chris, King
City of Palo Alto
City of Palo Alto Utilities
Clean Energy Fuels
Coast Economic Consulting
Commercial Energy
Consumer Federation of California
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center
Department of Water Resources
Dept of General Services
Division of Business Advisory Services
Douglass & Liddell
Downey & Brand
Duke Energy
Dutcher, John
Economic Sciences Corporation
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Hanna & Morton
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Intestate Gas Services, Inc.
Lawrence Berkeley National Lab
Los Angeles Dept of Water & Power
Luce, Forward, Hamilton & Scripps LLP
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MBMC, Inc.
MRW & Associates
Manatt Phelps Phillips
McKenzie & Associates
Merced Irrigation District
Modesto Irrigation District
Morgan Stanley
Morrison & Foerster
NLine Energy, Inc.
NRG West
Navigant Consulting
Norris & Wong Associates
North America Power Partners
North Coast SolarResources
Occidental Energy Marketing, Inc.
OnGrid Solar
Praxair
R. W. Beck & Associates
RCS, Inc.
Recurrent Energy
SCD Energy Solutions
SCE
SMUD
SPURR
San Francisco Public Utilities Commission
Santa Fe Jets
Seattle City Light
Sempra Utilities
Sierra Pacific Power Company
Silicon Valley Power
Silo Energy LLC
Southern California Edison Company
Spark Energy, L.P.
Sunshine Design
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Turlock Irrigation District
United Cogen
Utility Cost Management
Utility Specialists
Verizon
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
eMeter Corporation