



## Residential Solar Installers and Customers please note:

Please be advised that, pursuant to California Public Utilities Commission (CPUC) Decision (D.) 18-09-044 and D. 21-06-26, the CPUC requires all residential customers taking service and interconnecting solar under Net Energy Metering (NEM) to include additional information<sup>1</sup> and documentation<sup>2</sup> to support the CPUC's regulatory and enforcement efforts.

PG&E's interconnection portal requires that all of the following be provided:

As of September 30, 2019, please upload to PG&E's online interconnection portal ([YourProjects](#)), in the Document Upload page:

1. The signature page and the first 4 "initialed" pages<sup>3</sup> (5 pages total) of the CPUC's solar consumer information packet, entitled the "California Solar Protection Guide" (the "Guide"). IMPORTANT NOTE: Customers installing solar "have a right to read the entire 24-page Guide *before* signing a contract."
2. The Contractors State License Board's (CSLB) Solar Energy Disclosures Document (customers must sign if the CSLB requires a signature).
3. The solar provider installation contracts for power purchase agreements, leased, or customer-owned systems. (A solar provider<sup>4</sup> is defined in CPUC D. 18-09-044 as a vendor, contractor, installer, or financing entity that enters into a contract for a power purchase agreement, lease, or purchased solar system.)

*Note:* Each of the first three items above should be a separate document, i.e., there should be three separate documents uploaded. Links to obtain blank copies of the documents can be found at the end of this message. These three documents are collectively referred to as the "Consumer Protection Documents."

Starting in December 2021, the following information must also be provided in interconnection applications:

- a. Home Improvement Salesperson (HIS) number, if available;
- b. Address of the financing institution or lease provider, if project is financed or leased and not Property Assessed Clean Energy (PACE)-financed; and
- c. Customer's consent to disclose confidential information to state regulatory agencies for CPUC regulatory or enforcement purposes.

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<sup>1</sup> [Decision 21-06-026](#) Ordering Paragraph 2

<sup>2</sup> [Decision 18-09-044](#) Ordering Paragraphs 3 and 12

<sup>3</sup> Based on January 2021 Guide. Updates may have different pages. Refer to the latest guide for required initialed and signature pages.

<sup>4</sup> Solar providers are defined in D. 18-09-044 (p.7) as vendors, installers, financing entities, and contractors involved in the sale, lease, or power purchase agreement (PPA) of a rooftop solar energy system and applying to interconnect customers to the utility's distribution system.



## PG&E Solar NEM Consumer Protection Requirements

*NEMEXP and NEMMT Applicants: Providing Consent via NEM Application Addendum (Form 79-1215)*

If you are a residential solar applicant who applied for the Expanded NEM (NEMEXP or NEM2EXP) or NEM Multiple Tariffs (NEMMT or NEM2MT) programs, please fill out [Form 79-1215, NEM Application Addendum for Consumer Protection](#), and upload it in the document uploads section marked “Consumer Protection NEM Addendum.”

All the Consumer Protection Documents and information listed above must be uploaded at the time of application submittal via PG&E’s online interconnection portal, [YourProjects](#), before PG&E will proceed with processing the application (see attached guide for [screenshots](#) of the changes to the interconnection portals). The signed documents must be uploaded to confirm that customers have received the Guide and the CSLB Solar Energy Disclosures Document, and enables PG&E, the CPUC, CSLB, and California Department of Financial Protection and Innovation (DFPI) to review documents if needed.

For more information regarding these requirements, review the section below titled, “Frequently Asked Questions.”

Thank you,

PG&E’s Electric Grid Interconnection Team

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## Frequently Asked Questions

### 1. **Why is this happening?**

To promote better consumer protection, the CPUC and the State Legislature have put into place measures designed to help customers make a more fully informed decision about installing solar on their single-family homes when taking service under the Investor-Owned Utilities' (IOUs, i.e. PG&E, SCE and SDG&E) NEM programs. These measures were required by Assembly Bill 1070 (2017), CPUC Decision 18-09-044 (2018), and CPUC Decision 21-06-026 (2021).

CPUC Decision 18-09-044 includes a requirement that solar consumers review and sign a "Solar Consumer Protection Guide" that informs customers of various factors they should consider when installing solar at their home. Additionally, customers must review and sign, when and if the CSLB requires a signature, a CSLB Disclosure Form. Solar providers are then required to upload these two documents, along with the solar installation contract, as part of the IOU interconnection process. PG&E will track and store the documents it receives as part of customers' interconnection information and must provide these documents to the CPUC upon request. The IOUs must also validate, at interconnection, an installer's current CSLB license and type, which must be either type B - General Building Contractor, C10 - Electrical Contractor, or type C46 - Solar Contractor.

Per CPUC Decision 21-0-026, PG&E must require, as a condition of interconnection, 1) solar providers' Home Improvement Salesperson (HIS) registration number, if available (if not available, customer must indicate they are exempt and provide the applicable contractor's license instead); (2) the address of any entity that finances the project, including leases, through means other than Property Assessed Clean Energy financing, if applicable; and (3) customer's consent to disclosure of confidential information, for Commission regulatory or enforcement purposes.

### 2. **Who must submit documents and who doesn't have to?**

Residential customers with solar applications requesting service on NEM<sup>5</sup> are required to include the items Consumer Protection Documents and information listed on pages 1-2 above.

These requirements also apply in the following cases:

- a. NEM Multiple Tariff (NEMMT) if the installation involves a NEM solar project on a residence and consumer protection requirements apply; or
- b. NEM load aggregation (NEMA) where the customer's residence is a benefiting or generating account
- c. Residential solar customers who re-apply to make modifications to increase PV capacity to an existing approved system. (It does not apply to customers ONLY adding storage)

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<sup>5</sup> As referenced here, "NEM" here may refer to projects taking service on either Schedule NEM or NEM2.



# PG&E Solar NEM Consumer Protection Requirements

For reference, please also see the chart below:

Program Type	Sub Program Type
Standard NEM (with Modifications or Energy Storage)	<ul style="list-style-type: none"> <li>• Standard NEM Aggregation</li> <li>• Standard NEM Aggregation with Energy Storage</li> </ul>
NEMOther (including Expanded NEM with or without Energy Storage)	<ul style="list-style-type: none"> <li>• Expanded NEM Aggregation</li> <li>• Expanded NEM Aggregation with Energy Storage</li> </ul>
Combination of Programs (NEM Multiple Tariff, or NEMMT)	NEMA + Non-Export

The following are **exempt** from these consumer protection requirements:

- a. Self-installers (i.e., homeowners who install solar systems on their own homes without the help of licensed contractors) will have to self-identify but will not have to enter a contractor’s license number and are not required to submit the Consumer Protection Documents.
- b. Residential solar Interconnection applicants for new home construction, multi-family buildings, or for solar thermal systems are not required to submit the Consumer Protection Documents. (To qualify as new home construction, (i) the solar system must be installed at the same time that the home is being constructed, (ii) the final building permit must approve both the home and the solar system OR if solar and building permits are separate, they must be active at the same time, and (iii) the home must be currently being served by a residential rate schedule.) Non-residential applicants are not required to upload the Consumer Protection Documents.
- c. Existing residential single-family-home applicants with a contract to install solar signed on or before September 29, 2019, are required to upload only the signed contract.

For reference, please also see the chart below:

Program	Sub Program
NEM Fuel Cell(NEMFC)	NEM Fuel Cell NEM Fuel Cell Aggregation NEMMT NEM Fuel Cell + Non-Export
NEMV	NEMV NEMVMASH NEMVMASH DEV NEMVSOMAH
Non-Export	
RES-BCT	



## PG&E Solar NEM Consumer Protection Requirements

3. **Can solar providers upload a photo (or fax) of a wet signature from a customer on the Solar Consumer Protection Guide?**

PG&E will accept on its application portals only crisp, clear copies (e.g. electronic scans or photos) of the signed signature pages uploaded to its portals.

4. **How long do solar providers need to retain signed and initialed pages for compliance with spot audits?**

The CSLB recommends you refer to [Business and Professions Code \(BPC\) 7111\(a\)](#). Contact the CSLB for more information. The CPUC has not mandated a record retention period for the required records under Decision 18-09-044.

5. **Clarification on Requirements**

a. **What pages of the California Solar Consumer Protection Guide do I need to upload? Do I need to upload all 23 pages, only the 4 initialed pages and signature page, or only the signature page?**

You should be uploading (i) the Guide's first 4 pages (that require initialing at the bottom), as well as (ii) the signature page on page 23 (based on the January 2021 version of the Guide).

b. **What file formats are compatible with the interconnection portal requirements? For example, can I upload a JPG picture of the California Solar Consumer Protection Guide signature page in the portal?**

PG&E's YourProject Portal will allow upload of pdf (preferred) or jpeg file formats.

c. **We always include the one-page CSLB Solar Energy System Disclosure Document as part of our installation contract. Do I need to upload the CSLB Solar Energy System Disclosure Document as a stand-alone document in the portal, or can I upload the whole contract, which includes the CSLB Solar Energy System Disclosure Document to satisfy that requirement?**

The three Consumer Protection Documents should be uploaded separately. In the PG&E application portal, there are specific locations for the user to upload each such document, i.e., one to upload the initialed and signed Guide pages; one for the "CSLB Disclosure Document"; and one for the "Solar installation contract." In addition, a separate location is available to upload the "Consumer Protection NEM Addendum" (Form 79-1215), if required.



### 6. Signature Requirement for California Solar Consumer Protection Guide

**a. Who exactly is required to initial and sign the California Solar Consumer Protection Guide as the “customer”?**

The PG&E customer-of-record whose name is on the PG&E bill, or the person who is authorized to represent the customer-of-record that is applying for interconnection, should sign and initial the California Solar Consumer Protection Guide.

If the name on the contract, Guide, NEM agreement, and any other required documentation are not the same across all documents, PG&E will expect an explanation of the relationship between the parties signing each document to be included. This explanation is to be uploaded in the same file with the Guide.

**b. Does the customer need to be the same person associated with the service account? Note that if it does, that will cause problems if there is a renter on the service account and a landlord signing a contract for solar.**

The signature on the Guide should be signed by the customer-of-record on the bill issued by PG&E, or the person who is authorized to represent the customer-of-record. However, if the name on the contract, Guide, NEM agreement, and any other required documentation are not the same across all documents, PG&E will expect an explanation of the relationship between the parties signing each document to be included. This explanation is to be uploaded in the same file with the Guide.

**c. The California Solar Consumer Protection Guide requires a company representative to sign on the signature page. Who qualifies as a company representative?**

A company representative will qualify as a company representative if they are authorized to sign on behalf of the company. Consult an attorney if you have any questions.

**d. Can the [solar provider] company representative signature on the California Solar Consumer Protection Guide be filled out electronically, or does that have to be a wet signature?**

At this time, the solar provider's company representative's signature may be either a wet signature or electronic.



## 7. Spot Audits

### a. What are you looking for in spot audits?

As required by CPUC Decision 18-09-044, at a minimum PG&E will (1) confirm whether a solar provider has a valid CSLB license and entered that license number for its interconnection application, and (2) verify that the customer had signed forms attesting that the customer received and read the Guide and CSLB Solar Energy Disclosure Document prior to signing a contract or agreement with the solar provider.<sup>6</sup>

Note: CPUC Decision 21-06-026 authorizes the CPUC to establish and maintain a public list of solar providers whose interconnection applications have been found in non-compliance with applicable law or CPUC, CSLB, or DFPI rules and regulations. Once the CPUC establishes this list of noncompliant solar providers, PG&E is required to modify its spot audit procedures to audit a specified number of applications received from solar providers on the list.

### b. For example, will you be checking to see if the California Solar Consumer Protection Guide is signed prior to an installation contract?

See response to question 9.a.

### c. Are you going to review the information in the installation contract?

The installation contract may be reviewed by the CSLB or the CPUC.

### d. What else do I need to do to make sure I comply?

In addition to what guidance is provided in this email, you can review the CSLB and CPUC websites.

### e. Will the signatures have to match between documents? Many solar contracts are done through an “e-signature platform,” which will randomly assign a signature to the consumer. In such an instance, there will be a discrepancy between the signature on the California Solar Consumer Protection Guide and the installation contract.

If the name on the contract, Guide and NEM agreement, and any other required documentation are not the same across all documents, PG&E will expect an explanation of the relationship between the parties signing each document be included. This explanation is to be uploaded in the same file with the Guide.

### f. How long do I need to retain all these documents for compliance with spot audits?

See answer to question 5 above from the CSLB.

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<sup>6</sup> D. 18-09-044, page 34



### 8. Unique Circumstances that Impact California Solar Consumer Protection Guide Requirements

- a. **What if the home is not owned by a natural person but by an entity (i.e. a trust or an LLC)? Is anyone required to sign the California Solar Consumer Protection Guide, and, if so, who? It may not be possible for a solar provider to know the name of the natural person on whose behalf the LLC was structured.**

The Guide should be signed by the customer-of-record whose name is on the PG&E bill, or the person who is authorized to represent the customer-of-record, and who is applying for the interconnection.

If the name on the Guide, contract, NEM agreement, and any other required documentation are not the same across all documents, PG&E will expect an explanation of the relationship between the parties signing each document to be included. This explanation is to be uploaded in the same file with the Guide.

**What if the consumer's solar contract is with a general contractor (as part of a number of other renovations) and the solar installation is subcontracted out? In these circumstances, the name of the homeowner may not be known until after the subcontractor's work is completed, and thus, the solar provider (the subcontractor) would be unable to have the Guide signed before the consumer signs a contract to go solar.**

It should be signed by the customer-of-record whose name is on the PG&E bill, or the person who is authorized to represent the customer-of-record, and that is applying for the interconnection.

If the name on the Guide, contract, NEM agreement, and any other required documentation are not the same across all documents, PG&E will expect an explanation of the relationship between the parties signing each document to be included. This explanation is to be uploaded in the same file with the Guide.

For more information about the rules around remodels with added solar, the CSLB recommends you refer to [Business and Professions Code \(BPC\) 7159](#). Contact the CSLB for additional information.

9. **Who do I contact when I receive "Not Found" error when entering CSLB number in the interconnection portal?**

Contact the CSLB at (800) 321-CSLB (2572)

10. **Do I need to provide the Home Improvement Salesperson registration number?**

If a Home Improvement Salesperson was not involved in your project, you do not need to provide this information. However, if one was involved, please provide the registration number.





# PG&E Solar NEM Consumer Protection Requirements

**11. What if I want to apply for the NEM program as a residential solar customer, but I don't want to consent to disclosure of my confidential information?**

Pursuant to CPUC D. 21-06-026, a customer's consent to disclosure of their information to the CPUC, CSLB and DFPI for regulatory enforcement purposes is a condition of interconnection. Therefore, if a customer wants to participate in a NEM residential solar program, the customer must provide consent.

**12. I am a residential solar customer who wants to apply for PG&E's Expanded NEM (NEMEXP) or NEMMT programs, but I didn't grant my consent to disclose confidential information during the application process. What do I do?**

Please fill out PG&E [Form 79-1215](#) and upload it in the Document Upload page in the YourProjects application portal.

**13. Who do I contact at PG&E with questions related to the interconnection portals?**

Email the Interconnection Team at [Rule21GEN@pge.com](mailto:Rule21GEN@pge.com).

**14. Where do I obtain more information?**

PG&E NEM 2 Program Webpage	<a href="https://www.pge.com/nem2program">https://www.pge.com/nem2program</a>
CPUC California Solar Consumer Protection Guide Webpage	<a href="https://www.cpuc.ca.gov/solarguide/">https://www.cpuc.ca.gov/solarguide/</a>
CSLB Solar Installer Webpage	<a href="http://www.cslb.ca.gov/contractors/SolarSheet.aspx">http://www.cslb.ca.gov/contractors/SolarSheet.aspx</a>
The Department of Financial Protection and Innovation (DFPI) website	<a href="https://dfpi.ca.gov/">https://dfpi.ca.gov/</a>
Assembly Bill 1070 – Consumer Protection	<a href="#">AB 1070</a>
CPUC Decisions - Consumer Protection	<a href="#">D. 18-09-044</a> <a href="#">D. 21-06-026</a>
User Guides to the changes to PG&E's interconnection portals can be found on our interconnection web portal homepages.	<a href="http://yourprojects-pge.com">yourprojects-pge.com</a>