

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 1, 2014

Center for Sustainable Energy Advice Letter (AL) 51  
Southern California Gas Company AL 4682  
Pacific Gas and Electric Company AL 3503-G  
Southern California Edison AL 3096-E

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Center for Sustainable Energy  
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Subject: Proposed modifications to California Solar Initiative (CSI) Thermal Program Handbook, primarily related to solar pools.

Dear Mr. Constantine et al:

This letter disposes of the advice letters (AL) Center for Sustainable Energy AL 51, Southern California Gas Company AL 4682, Pacific Gas and Electric Company AL 3503-G, and Southern California Edison AL 3096-E, all filed jointly on August 20, 2014. The advice filings are approved as filed and effective immediately.

Background:

On August 20, 2014 the four California Solar Initiative (CSI) Thermal program administrators (PAs), CSE, SCG, PG&E and SCE, jointly filed advice letters 51, 4682, 3503-G and 3096-E, respectively, to request a decrease in the incentive rates for solar pool heating systems and propose other amendments to the CSI-Thermal Program Handbook (HB).

The jointly filed advice letter was timely protested by California Solar Thermal, Inc. (CST). On September 9, 2014 CST filed a protest based on concerns in several areas regarding: lowering of the rebate level; freeze protection requirements for solar pool systems (HB Section 5.5.2); an added section on requirements for roof mounting of unglazed collectors (HB Section 5.5.8); process for handling applications in the event of a calculator change (HB Section 5.6.2); and documentation requirements for solar pool applications (HB Section 5.7.2).

On September 16, 2014 the PAs filed a reply to CST's protest, addressing each of the concerns raised by CST.

Also on September 16, 2014, the Energy Division suspended the joint AL for up to 120 days.

#### Discussion:

The August 20, 2014 Tier 2 advice letter joint filing, CSE 51-E, PG&E 3502-G, SCE 3096-E, and SCG 4682, requests modifications to the CSI Thermal Handbook and CSI Thermal pools incentive levels. In particular, the PAs request to lower the pools initial rebate levels from \$7 per annual therm saved to \$5 per therm.<sup>1</sup> The AL explains that the current rebate level covers a larger than expected portion of the installation costs. It goes on to aver that a lower rebate level will continue to encourage the installation of solar pool heating systems. Other requested HB changes include: changing the name of California Center for Sustainable Energy to Center for Sustainable Energy to reflect that organization's name change; clarified stagnation/overheat protection and other technical installation requirements; and clarification of how applications are handled in the event of a savings calculator change.

Commission decisions provide PAs with the authority to file changes to the CSI Thermal Handbook and to the rebate levels for swimming pools. Specifically, on January 21, 2010, the Commission approved Decision (D.)10-01-022 to establish the California Solar Initiative Thermal Program to provide solar water heating incentives. In this decision, the Commission provides, "On an ongoing basis, in response to program experience and evaluation, or when a Commission decision or statutory change requires handbook updates, the PAs shall submit CSI Thermal Program Handbook changes through the advice letter process."<sup>2</sup>

In addition, pursuant to AB 2249 (Stats. 2012, ch. 607), the Commission adopted D.13-08-004 to expand the CSI Thermal program to include incentives for solar swimming pool heating systems.<sup>3</sup> Pursuant to this decision, the Commission adopted a incentive rebate levels and provided that, "We will allow the PAs to file a Tier-2 Advice letter, if they subsequently find incentives are too high."<sup>4</sup>

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<sup>1</sup> They request a reduction for Step 1 and 2 to \$5 per therm; for Step 3 to \$4 per them; and for Step 4 to \$3 per therm.

<sup>2</sup> D.10-01-022, pg. 73.

<sup>3</sup> Single-family residential solar pool heating systems were specifically excluded from the definition of a solar water heating system

<sup>4</sup> D.13-08-004 pg.18.

Accordingly, pursuant to D.10-01-022 and D.13-08-004, the jointly filed Tier 2 advice letter is compliant with Commission decisions. See Attachment A for additional detail on Energy Division staff's review of CRT's protest and the PAs' reply.

To implement the changes requested in the AL, the PAs request seven calendar days upon approval of the AL to implement the new incentive levels for solar pool applications in the statewide database and forty five calendar days upon approval to implement all other relevant changes in the statewide database. This request is approved.

For the reasons discussed above, the ALs CSE 51-E, PG&E 3502-G, SCE 3096-E, and SCG 4682 are approved as filed and are effective immediately.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Director, Energy Division

cc: California Solar Thermal, Inc.

Attachment A  
Energy Division Staff Review of Protested Issues

Advice Letter CSE 51, SCG 4682, PG&E 3503-G, SCE 3096-E was timely protested by California Solar Thermal, Inc. (CST). CST raises concerns about the proposal to reduce incentive rebate levels for solar pool heating systems as well as a number of concerns regarding the proposals to make CSI Thermal Handbook changes. Energy Division's review of these protested issues as well as the PAs' replies are discussed below.

Lowering of the rebate level:

In the advice letter, CSE, on behalf of the CSI Thermal program administrators (PAs), requests that the incentive rates for solar pool heating systems be reduced.<sup>5</sup> Based on the PAs' analysis of over 50 solar pool heating systems, they assert that the current initial \$7 per therm rate is "overly generous" and offsets more of a system's costs than was originally anticipated.<sup>6</sup> They state that the needs of the majority of the solar water heating community will continue to be met with lower incentive rates and the CSI Thermal pools program will continue to promote a sustainable solar pool heating system industry.

CST protests the lower incentive proposal. CST acknowledges that the current rebate level of \$7 per therm allows for CSI-Thermal rebates to cover 100% of the cost for many multifamily residential solar pool heating systems. However, CST points out that construction for governmental, educational, and nonprofit organizations is significantly more expensive, due to such requirements as "prevailing wage, larger piping, underground piping, mechanical engineering, more complicated controls/pumps, etc."<sup>7</sup> CST therefore argues that the current rebate level is needed in order to make pool heating projects an attractive option and to create a viable market for this customer sector. CST believes that without this incentive, companies like theirs will struggle to sell systems to government and other non-commercial clients. CST argues that a better way to prevent rebates from covering more than 50% of the initial system costs is to set up a 50% rebate cap, of the type that was proposed in the July 23, 2014 Petition to Modify of D.12-08-008 and D.13-08-004 which was filed jointly by the California Solar Energy Industries Association (CALSEIA) and the CSI-Thermal PAs in Rulemaking (R.)12-11-005.

In their reply, the PAs maintain their assertion that a rebate reduction is necessary. They point out that they intend to lower the wind ratio in the solar pool calculator<sup>8</sup>, in keeping with an agreement made with the solar pool industry in discussions in April 2014. They note that because lowering the wind ratio will increase estimated generation (and estimated therm savings), a decrease in the rebate level is necessary in order to avoid further over-paying for these pool systems.

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<sup>5</sup> They request a reduction for Step 1 and 2 to \$5 per therm; for Step 3 to \$4 per therm; and for Step 4 to \$3 per therm.

<sup>6</sup> Pg 2

<sup>7</sup> CST protest, pg.2.

<sup>8</sup> Lowering the calculator's wind ratio from 0.5 to 0.3 would decrease the estimated amount of heat carried away by ambient air, and thereby increase the estimated amount of effective heat generated by the solar collector.

Furthermore, the PAs note that the 270 pools applications which the program has so far received cover, on average, 86% of the initial system cost. The PAs argue that it was not the intention of the CSI-Thermal program to provide free pool systems, and that providing these very high rebate levels is not beneficial to the long term success of the market.

In D.13-08-004, the Commission adopted an incentive rate for solar pool heating systems and also provided that if PAs find the incentives are too high, they should file a Tier 2 advice letter to request lower incentive levels. As is discussed in Advice Letter CSE 51, SCG 4682, PG&E 3503-G, SCE 3096-E, the PAs analysis of solar pool heating system costs shows that current incentive levels are too high. Lowering the rebate level as proposed by the PAs is consistent with D.13-08-004, which gave the PAs discretion to propose a lower incentive level if they subsequently find incentives are too high.<sup>9</sup> CST acknowledges that current rebate levels can allow 100% of the cost for many multifamily residential pools systems to be covered. We agree with the PAs that this is excessive and therefore reject the protest.

#### CSI Thermal Handbook Changes:

The PAs also propose over 30 changes to the Handbook (HB), affecting many sections in the HB. CST protests a number of these requests, including freeze protection requirements for solar pool systems (HB Section 5.5.2); an added section on requirements for roof mounting of unglazed collectors (HB Section 5.5.8); process for handling applications in the event of a calculator change (HB Section 5.6.2); and documentation requirements for solar pool applications (HB Section 5.7.2).

Pursuant to D.10-01-022, the Commission directs PAs to submit changes to the CSI Thermal Program Handbook through the advice letter process in response to program experience and evaluation, or when a Commission decision or statutory change requires handbook updates.<sup>10</sup>

We address each proposed HB update in order below.

#### 1. Freeze protection for solar pool systems

The freeze protection HB language proposed in the AL allows for two types of freeze protection: drainback and the use of glycol antifreeze. In its protest, CST states that the proposal misses the mark because it ignores the fact that most commercial pool pumps are set for continuous recirculation. CST requests that recirculation be allowed as a form of freeze protection, along with an auxiliary drainback feature which would activate during power outages.

In their reply, the PAs maintain that recirculation freeze protection should not be allowed in the Program, arguing that by running all night it wastes thermal (pool heat) as well as mechanical (pump) energy. They also state that CST's proposal requires an uninterruptible power supply in case the grid fails, seriously raising the cost of the installed system. They

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<sup>9</sup> D.13-08-004, pg. 18.

<sup>10</sup> D.10-01-022, pg. 73.

reiterate that the Program allows two options, drainback and glycol, which will cover all possible applications.

We find the PAs arguments persuasive regarding the higher cost of recirculation freeze protection and the waste energy that it would create, as well as availability of other options. Therefore, we reject the protest.

## 2. Roof mounting of unglazed collectors

The HB notes that unglazed collectors experience large expansion and contraction cycles and therefore require special measures to mitigate the resulting mechanical stresses. The language proposed by the PAs requires the use of expansion joints or loops for certain system components. CST takes exception to this, stating that manufacturers already incorporate these features. The PAs maintain the necessity of the language, citing experience of many pool heating systems built without expansion joints that failed due to long stagnation periods.

We find the PAs argument regarding past experience with failed systems to be of paramount importance. Therefore, we reject the protest.

## 3. Handling of applications in the event of a calculator change

CST's protest relates to existing HB language. The HB currently states that if a calculator change occurs after the submission of an application and before its confirmation, the new calculator will be used when issuing the confirmed reservation and the PA will notify the applicant of the change. At that time, the applicant has the choice of keeping the reservation based on the new calculator or withdrawing the application (within thirty days) and being refunded its application fee (after thirty days the fee is forfeited).

CST is concerned about its exposure to uncertainty during the period between application submission and confirmation. CST requests instead that the calculator that was in place at the time of the application submission be used.

The PAs reply that the current HB states that the "CPUC reserves the right to modify the calculator at any time without advance notice to Applicants," but argues that they and the CPUC have consistently notified industry in advance of calculator changes. Thus, the PAs see no reason to modify the HB language.

We find CST's protest to be out-of-scope, as this AL does not address calculator changes. Therefore, we reject the protest.

## 4. Photo documentation for applications

The proposed HB language requires that photographs showing system details be submitted along with the incentive claim form (ICF), which follows system installation. CST objects, noting that this requirement is burdensome and that there is no way to verify that the photos belong to the application under consideration.

The PAs reply that, because there are already other documentation requirements, these photos will not be burdensome. The PAs express concern about an inexperienced large pool industry segment where the quality of installations may be low. The Program lacks sufficient funds to inspect every system and so the photos supplement this oversight, as well as make a paper trail of documentation.

We find the PAs arguments compelling as their proposal seeks an appropriate balance between the need for a documentation that systems have been installed properly versus the cost of doing so. Therefore, we reject the protest.

In conclusion, Energy Division staff have reviewed the AL filing, protest and replies. We find that the joint AL was filed in conformance to D.10-01-022 and D.13-08-004. We reject the protests for the foregoing reasons and approve the AL as filed.



August 20, 2014

**Advice No. 51**  
**(Center for Sustainable Energy)**

**Advice No. 4682**  
**(Southern California Gas Company – U 904-G)**

**Advice No. 3503-G**  
**(Pacific Gas and Electric Company – U 39 M)**

**Advice No. 3096-E**  
**(Southern California Edison – U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT: Proposed Revisions to Incentive Levels for Solar Pool Heating Systems and Additional Amendments to the California Solar Initiative-Thermal Program Handbook**

## **PURPOSE**

The Center for Sustainable Energy (CSE), formerly known as the California Center for Sustainable Energy (CCSE), on behalf of the California Solar Initiative-Thermal (CSI-Thermal) Program Administrators (PAs),<sup>1</sup> hereby submits this advice filing to propose a decrease in the incentive rates for solar pool heating systems and propose other amendments to the CSI-Thermal Program Handbook.

## **BACKGROUND**

On January 21, 2010, the California Public Utilities Commission (Commission or CPUC) approved Decision (D.) 10-01-022, *Decision Establishing the California Solar Initiative Thermal Program to Provide Solar Water Heating Incentives*. In Section 14.2 of D.10-01-022, the Commission states:

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<sup>1</sup> The CSI-Thermal PAs are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and CSE in the service territory of San Diego Gas & Electric Company (SDG&E).

On an ongoing basis, in response to program experience and evaluation, or when a Commission decision or statutory change requires handbook updates, the PAs shall submit CSI Thermal Program Handbook changes through the advice letter process.<sup>2</sup>

Additionally, on August 15, 2013, the Commission approved D.13-08-004, *Decision to Incorporate Solar Pool Heating Systems into the California Solar Initiative – Thermal Program*. In section 3.8 of the Decision, with respect to incentive levels for solar pool heating systems, the Commission states: “We will allow the PAs to file a Tier-2 Advice letter, if they subsequently find incentives are too high.”<sup>3</sup>

Accordingly, in this advice filing, CSE, on behalf of the CSI-Thermal PAs, hereby requests the lowering of the incentive rates for solar pool heating systems in compliance with Assembly Bill (AB) 2249 (Stats. 2012, ch. 607). The PAs believe that the current \$7 per therm rate is overly generous and therefore offsets a higher than anticipated portion of the installation costs. Lowering the incentive rates will meet the needs of the majority of the solar water heating community and will continue to promote and encourage the installation of solar pool heating systems.

Additionally, CSE, on behalf of the CSI-Thermal PAs, hereby submits other proposed revisions to the CSI-Thermal Program Handbook. The revisions will allow the PAs to further simplify the application submittal process as well as provide clarity to various sections of the CSI-Thermal Program Handbook.

## **SUMMARY OF PROPOSED AMENDMENTS TO THE CSI-THERMAL PROGRAM HANDBOOK**

The proposed revisions to the current version of the CSI-Thermal Program Handbook are summarized below and shown in redline format in Attachment A to this advice filing.

### **Proposal to Reduce Incentive Levels for Solar Pool Heating Systems**

Affected Section(s): 5.3

The PAs have reviewed and analyzed over fifty (50) solar pool heating system applications and are recommending the reduction of the incentive rates based on Table 1 below, as follows: reduction for Step 1 and 2 to \$5 per therm; for Step 3 to \$4 per therm; and for Step 4 to \$3 per therm.

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<sup>2</sup> D.10-01-022, page 73.

<sup>3</sup> D.13-08-004, page 18.

The PAs’ original assumptions were based on much higher than anticipated installation costs for swimming pools. However, the results indicate that solar pool heating system installation costs are substantially lower, thus the current incentive results in a far greater offset than expected and should be lowered. The reduction of the incentive levels will be more in line with the original goal of offsetting approximately half of the installation costs. The costs of unglazed polymer collectors and plastic PVC piping used for solar pool heating applications, along with simplified installation requirements, have allowed for solar pool heating systems to be installed at almost half of the PAs’ original estimate.

This effort is in line with the goal of achieving the installation of natural gas-displacing solar thermal systems that displace 585 million therms (equivalent to 200,000 single-family residential systems) over the 25-year life of the systems. By reducing the incentive levels for solar pool heating systems, more funds will be available for additional installations at a lower incentive level, which would displace a higher number of therms.

Table 1

Proposed Solar Pool Heating System Incentive Steps

Step	Incentive per Annual Therm Displaced for Solar Pools	Maximum Incentive Multifamily/Commercial Projects
1	\$5.00	\$500,000
2	\$5.00	\$500,000
3	\$4.00	\$500,000
4	\$3.00	\$500,000

**Additional Proposed Amendments to the CSI-Thermal Program Handbook**

Changed California Center for Sustainable Energy (CCSE) to Center for Sustainable Energy (CSE) to reflect the organization’s name change

Affected Sections: Multiple sections throughout

Updating OG-300 & 100 to follow current nomenclature of Standard 100 & 300

Affected Sections: Multiple Sections throughout

Clarified Oversizing rules

Affected Section: 2.5.1

Clarified Stagnation/Overheat Protection

Affected Sections: 2.5.3, 3.5.3, 4.5.3, 5.5.3

Updated the minimum SOF permitted for Standard 300 solar water heating systems  
Affected Section: 2.4.1, 2.6.1, 13.1.3, Appendix D

Clarified natural gas eligibility for new construction to be consistent with other chapters  
Affected Section: 3.2.1

Clarified incentive limitations to be consistent with other chapters and clarify tilt and azimuth requirements for multifamily/commercial systems  
Affected Section: 3.3.3, 4.3.3, 5.3.1

Removed Surface Orientation Factor restriction for multifamily/commercial systems  
Affected Sections: 3.4.1

Clarified freeze protection for multifamily/commercial and solar pool systems  
Affected Sections: 3.5.2, 4.5.2, 5.5.2, 12.2

Added a section on requirements for roof mounting of unglazed collectors  
Affected Sections: 3.5.8, 4.5.8, 5.5.8

Clarified how applications will be treated in the event of a calculator change  
Affected Sections: 3.6.2, 5.6.2

Included Ineligible equipment section for PBI systems to be consistent with other chapters  
Affected Section: 4.4.1

Included general information about installation requirements to be consistent with other sections  
Affected Section: 4.5

Updated Eligible Equipment for Solar Pool Systems  
Affected Sections: 5.4

Removed erroneous requirement that multifamily/commercial systems must be installed according to SRCC or IAPMO standards and guidelines  
Affected Sections: 3.5, 5.5

Updated and clarified freeze protection requirements for solar pool systems. Most details will be included in the CSI-Thermal Program Inspection Checklist.  
Affected Sections: 5.5.2, 5.7.1, C.24, Appendix O

Updated CPM metering requirements for solar pool systems  
Affected Sections: 5.5.4

Clarified PBI requirements for combination systems including a solar pool system  
Affected Sections: 5.5.4.3

Clarified energy efficiency/pool cover requirements for solar pool systems

Affected Section: 5.5.5

Removed requirement for solar pools applications to submit an energy efficiency audit report

Affected Section: 5.5.5, 5.7.1

Updated requirements for roof mounting of unglazed collectors for solar pool systems

Affected Section: 5.5.8

Removed requirement for solar pool systems that the estimated annual energy savings cannot exceed actual gas usage based on the last twelve months of utility bills prior to solar installation

Affected Section: 5.6.1

Increase the pool system size that required application fees from >30kWth to >50kWth

Affected Sections 5.7.1, Table 18

Included additional required documents for solar pool applications

Affected Section: 5.7.2, C.24, Appendix O

Added exemption for solar pool systems to require pipe insulation

Affected Section: 8.2

Allowed a pool cover to be included in the total eligible project costs for a solar pool system application

Affected Section: 11.1

Reorganized and updated freeze protection section to clarify different requirements for non-pool end user and solar pool systems

Affected Section: 12.2

Clarified requirements for drainback systems with unglazed collectors on a flat roof

Affected Section: 12.2.6

Added that the CSI-Thermal Inspection Checklists shall be the prime documents for specific technical requirements and may be updated based on experience gained from inspecting and observing installations

Affected Section: 13.1

Added clarification for failure items; protection from ultraviolet radiation and back thermosiphon prevention

Affected Section: 13.1.3

Updated language for roof penetrations

Affected Section: 13.1.3

Clarified the requirements for owners' manuals and added instruction for manual drainage for seasonal solar pool systems

Affected Section: 13.1.3

Added definition of seasonal pools

Affected Section: Appendix B

Added definition of surface orientation factor

Affected Section: Appendix B

Clarified PBI metering requirements

Affected Section: Appendix I

**TIER DESIGNATION**

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, this Advice Letter is submitted with a Tier 2 designation.

**PROTESTS**

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than September 9, 2014, which is twenty (20) days after the filing of this Advice Letter. Protests should be mailed to:

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave., 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

A copy of the protest should also be sent via e-mail and U.S. mail to CSE at the address shown below on the same date it is mailed or delivered to the Commission:

**For CSE:**  
Sachu Constantine  
Director of Policy  
Center for Sustainable Energy  
9325 Sky Park Court, Suite 100  
San Diego, California 92123  
E-mail: [sachu.constantine@energycenter.org](mailto:sachu.constantine@energycenter.org)

**For SoCalGas:**

Attn: Sid Newsom  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
E-mail: [snewsom@SempraUtilities.com](mailto:snewsom@SempraUtilities.com)

**For SCE:**

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Vice President of Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Mike R. Hoover  
Director, State Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
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San Francisco, California 94102  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

**For PG&E:**

Brian K. Cherry  
Vice President, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

There are no restrictions as to who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

**EFFECTIVE DATE**

CSE requests that this Advice Letter become effective on regular notice, September 19, 2014, which is thirty (30) calendar days after the date of filing. To implement the changes requested in the Advice Letter, the PAs request seven (7) calendar days upon approval of this Advice Letter to implement the new incentive levels for solar pool applications in the statewide database and forty five (45) calendar days upon approval of this Advice Letter to implement all other relevant changes in the statewide database.

**NOTICE**

CSE is providing a copy of this Advice Letter to service list R.12-11-005.

A handwritten signature in black ink, appearing to read 'Sachu' followed by a stylized, cursive signature.

Sachu Constantine  
Director of Policy  
Center for Sustainable Energy

Attachments:

Attachment A – Redline California Solar Initiative-Thermal (CSI-Thermal) Program Handbook  
illustrating proposed amendments

cc: Service List R.12-11-005

# 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. Center for Sustainable Energy (CSE)

Utility type: N/A

ELC  GAS

PLC  HEAT  WATER

Contact Person: Sephra Ninow

Phone #: (858) 244-1186

E-mail: sephra.ninow@energycenter.org

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 51

Subject of AL: Proposed Revisions to Incentive Levels for Solar Pool Heating Systems and Additional Amendments to the California Solar Initiative-Thermal Program Handbook

Keywords (choose from CPUC listing): Compliance; Natural Gas; Name Change; Rebates

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.10-01-022

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<sup>1</sup>: N/A

Resolution Required?  Yes  No

Requested effective date: September 19, 2014 No. of tariff sheets: 0

Estimated system annual revenue effect (%): 0

Estimated system average rate effect (%): 0

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: N/A

Service affected and changes proposed<sup>1</sup>: California Solar Initiative Thermal Program: Proposed decrease in the incentive rates for solar pool heating systems and other amendments to the CSI-Thermal Program Handbook

Pending advice letters that revise the same tariff sheets: N/A

**Protests 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**  
**Attention: Tariff Unit**  
**505 Van Ness Ave., 4<sup>th</sup> Flr.**  
**San Francisco, CA 94102**  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

**Center for Sustainable Energy**  
**Sachu Constantine**  
**9325 Sky Park Court, Suite 100**  
**San Diego, CA 92123**  
[sachu.constantine@energycenter.org](mailto:sachu.constantine@energycenter.org)

<sup>1</sup> Discuss in AL if more space is needed.

On behalf of the California Solar Initiative Thermal (CSI-Thermal) Program Administrators, please find CSE Advice Letter 51 / SCG Advice Letter 4682 / PG&E Advice Letter 3503-G / SCE Advice Letter 3096-E, an advice filing to propose revisions to incentive levels for solar pool heating systems and additional amendments to the CSI-Thermal Program Handbook.

Due to the size of Attachment A, the Redline CSI-Thermal Program Handbook illustrating proposed amendments, rather than providing a hard copy of the document, we instead provide notice that Attachment A may be viewed at:

[http://energycenter.org/sites/default/files/docs/ext/dg-re/csi-t/CSI-Thermal%20Handbook August%202014 FINAL%20DRAFT%208.19.14.docx](http://energycenter.org/sites/default/files/docs/ext/dg-re/csi-t/CSI-Thermal%20Handbook%20August%202014%20FINAL%20DRAFT%208.19.14.docx)

If you would like to request a hard copy of the Redline CSI-Thermal Program Handbook illustrating proposed amendments, please contact Sephra Ninow via e-mail at [sephra.ninow@energycenter.org](mailto:sephra.ninow@energycenter.org) or via telephone at 858-244-1186.

Thank you!

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for the California Solar  
Initiative, the Self-Generation Incentive Program and  
Other Distributed Generation Issues.

RULEMAKING 12-11-005  
(Filed November 8, 2012)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of this *CSE ADVICE LETTER 51 / SCG ADVICE LETTER 4682 / PG&E ADVICE LETTER 3503-G / SCE ADVICE LETTER 3096-E*, on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.12-11-005 or by delivering a copy via U.S. First Class mail to those members of the current service list for R.12-11-005 with no or undeliverable email addresses.

Executed on August 20, 2014, in San Diego, CA.



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# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

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**PROCEEDING: R1211005 - CPUC - OIR REGARDING  
FILER: CPUC  
LIST NAME: LIST  
LAST CHANGED: AUGUST 14, 2014**

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