

Residential Solar Installers please note:

Starting September 30, 2019, please be advised that the California Public Utilities Commission (CPUC) will require all residential customers taking service and interconnecting solar under Net Energy Metering (NEM)¹ include three (3) new documents (in addition to other applicable documents) from the solar provider². PG&E's interconnection portals will require solar providers to upload these 3 new documents:

- i. Documentation that customers have received the CPUC's solar consumer information packet, titled the "California Solar Consumer Protection Guide" (the "Guide"); From the Guide³, the documentation to be uploaded includes the signature page and the first 4 "initialed" pages. (5 pages total); IMPORTANT NOTE: Customers installing solar "have a right to read this entire 23-page guide *before* signing a contract." (Based on the September 2019 version of the Guide)
- ii. The Contractors State License Board's (CSLB) Solar Disclosures Document (customers must sign it when and if the CSLB requires a signature);
- iii. The solar provider installation contracts for power purchase agreements, leased, or customer-owned systems. (A solar provider is defined in the CPUC Decision 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 three items above should be a single document - there should be 3 separate documents uploaded. Links to obtain blank copies of the documents can be found at the end of this message.

The three documents must be uploaded at the time of application submittal via PG&E's online interconnection portals before PG&E will proceed with processing the application (see attached guide for screenshots of the upcoming changes to the interconnection portals). These three signed documents that must be uploaded by solar providers confirm that customers have received the CPUC Guide and the Contractors State License Board's Solar Disclosures document, and enables PG&E the CPUC or CSLB to review contracts if needed.

When will these Changes Go into Effect?

PG&E's NEM Application portals (both SNEM and ACE-IT) will be down beginning **6:00 pm on Friday, September 27, 2019**, and will become available again (with the updated requirements) beginning **8:00 am Monday, September 30, 2019**.

For more information regarding this upcoming requirement, review the section below titled, "Frequently Asked Questions."

Thank you,

PG&E's Electric Grid Interconnection Team

¹ [Decision 18-09-044](#) Ordering Paragraphs 3 and 12

² 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.

³ Based on July 2019 Guide. Updates may have different pages. Refer to the latest guide what must be signed.

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) and CPUC Decision 18-09-044 (2018), and include 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 it 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.

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

Residential customers with solar applications requesting service on NEM⁴ are required to include the three documents listed 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)

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 3 documents.
- b. Residential solar Interconnection applicants for new home construction, multi-family buildings, or for solar thermal systems are not required to submit the 3 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 also not required to upload these 3 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.

⁴ "NEM" here may refer to projects taking service on either Schedule NEM or NEM2.

3. What if the installation contract is signed before September 30th but the PG&E Interconnection application is submitted on or after September 30th?

Existing residential single-family-home applicants with a contract to install solar signed before September 29, 2019, are required to upload only the signed contract in a single file for each of the three document types.

4. Can solar providers upload a photo (or fax) of a wet signature from a customer on the solar 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.

5. 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.

6. 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 September 2019 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 SNEM and ACEIT Portals 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?

Yes, the 3 documents should be uploaded separately. In its application portals, PG&E has added 3 specific locations for the user – one to upload the "California Solar Consumer Protection Guide", one for the "CSLB Disclosure Document", and one for the "Solar installation contract."

d. My customer signed an installation agreement before September 29th, but then the contract needed an amendment or change order after September 30th. Do I need to have the customer sign and initial a California Solar Consumer Protection Guide?

Yes, new or amended documents after September 29th require all documents to be upload.

7. Signature Requirement for Solar Consumer 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, and that is applying for interconnection should sign and initial the Consumer Protection Guide.

If the name on the contract, consumer guide and NEM agreement are not the same across all three 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 consumer 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 California Consumer Protection Guide should be signed by the customer-of-record bill, or the person who is authorized to represent the customer-of-record. However, if the name on the contract, consumer guide and NEM agreement are not the same across all three 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 the consumer 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 the 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 providers company representative’s signature may be either a wet signature or electronically filled out.

e. Can a customer e-initial (for example, with DocuSign) the first four pages of the consumer guide, and then wet sign the last page?

At this time, the solar providers company representative’s signature may be either a wet signature or electronically filled out.

8. 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 information packet and Solar Energy Disclosure Document prior to signing a contract or agreement with the solar provider⁵.

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

⁵ D. 18-09-044, page 34

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, consumer guide and NEM agreement are not the same across all three 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 consumer 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.

9. Unique Circumstances that Impact Solar Consumer 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 consumer guide, contract and NEM agreement are not the same across all three 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 consumer 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 consumer 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 consumer guide, contract and NEM agreement are not the same across all three 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 consumer 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.

10. 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)

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

Email the Interconnection Team at Rule21GEN@pge.com.

12. Where do I obtain more information?

PG&E NEM 2 Program Webpage

CPUC Solar Guide Webpage

CSLB Solar Installer Webpage

Assembly Bill 1070 – Consumer Protection

CPUC Decision - Consumer Protection

Updates will be posted at a future date on:

<https://www.pge.com/nem2program>

<https://www.cpuc.ca.gov/solarguide/>

<http://www.cslb.ca.gov/contractors/SolarSheet.aspx>

[AB 1070](#)

[D. 18-09-044](#)

User Guides to the changes to PG&E’s interconnection portals can be found the on our interconnection web portal homepages.

[ACE-IT Interconnection](#)

[Standard Net Energy Metering Interconnection](#)