



Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations

January 3, 2019

ADVICE 3932-E
(Southern California Edison Company - U 338-E)

ADVICE 5463-E
(Pacific Gas and Electric Company – U 39 E)

ADVICE 3320-E
(San Diego Gas & Electric Company – U 902 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Methodology to Categorize and Quantify Solar
Complaints Received in Compliance with Decision 18-09-044

In compliance with Ordering Paragraph (OP) 6 of Decision (D.)18-09-044, Southern California Edison Company (SCE), on behalf of itself, Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (jointly, the investor-owned utilities, or IOUs), hereby submits a methodology for categorizing and quantifying customer complaints related to solar that are received by the IOUs.

PURPOSE

The purpose of this advice letter is to provide a methodology for categorizing and quantifying customer complaints related to solar that are received by the IOUs pursuant to OP 6 of D.18-09-044.

BACKGROUND

Assembly Bill (AB) 1070 (Stats. 2017, Chap. 662)¹ requires, among other things, the Contractors State License Board (CSLB) to receive and review customer complaints and questions regarding solar energy companies and solar contractors, and publish an annual report documenting customer complaints related to solar, beginning July 1, 2019. In OP 6 of D.18-09-044, the Commission directs the IOUs to support these consumer protection measures by submitting a Tier 2 advice letter within 90 days of the issuance of D.18-09-044 proposing a method for categorizing and quantifying customer complaints related to solar on a quarterly basis. The proposed methodology is intended to be used in information-only advice letters submitted quarterly by the IOUs, pursuant to OP 7 of D.18-09-044. The IOUs are also directed to include a category of complaints related to third-party providers, broken down into types of complaints. OP 6 also requires the IOUs to assist the Commission, to the extent requested, in developing a process for collecting data on solar complaints efficiently and accurately, and for providing this information to the CSLB.

DISCUSSION

The IOUs propose that the scope of complaints categorized, quantified, and reported to the CPUC encompass customer complaints related to customer experience with exploring or adopting solar photovoltaic systems, including complaints regarding third party solar providers. D.18-09-044 does not specify the criteria that the IOUs should use to identify a communication to the IOUs as a “complaint,” and each IOU has different criteria for determining what would be considered a complaint from a customer. For the purposes of complying with the directives in OP 6 and OP 7, the IOUs propose to define a complaint as a negative communication from customers who have or are considering adopting solar photovoltaic systems that can be classified into one of the categories described below.

Proposed Method for Tracking Solar Complaints

The IOUs can receive complaints via several different channels, including through their call centers and program staff. The IOUs will collect these complaints and aim to standardize categorization of these complaints as much as possible to assist the Commission in identifying statewide trends when examining individual IOU quarterly reports.

¹ Full text is available at http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1070.

Complaint Categories

The IOUs propose to categorize complaints into the following categories on a quarterly basis. These categories are informed by the IOUs' records of complaints received and by the regulatory record. In the regulatory record, information on the types of complaints typically communicated by solar customers was available from:

- Feedback collected at the October 20, 2016 workshop on consumer protection issues;
- Party comments responding to the "Administrative Law Judge's Ruling Seeking Comment on Consumer Protection and Related Issues," filed December 8, 2016;
- A workshop and written comments summarized in the "Final Report Prepared by Pacific Gas and Electric Company on the Solar Consumer Protection Forum Held in Huron, California on July 10, 2018, Pursuant to the Ruling of ALJ Valerie Kao," filed August 31, 2018;
- Party comments on the proposed decision that resulted in D.18-09-044.

The IOUs propose the following categories of consumer complaints related to solar:

A. Complaints Related to Third Party Solar Providers

a. Inappropriate Sales Tactics

1. Use of IOUs' emergency help line to access customer data
2. Use of customers' online My/Your Account portal
3. Unauthorized use of IOUs' name, brand or logo
4. Impersonating an IOU representative or partner
5. Impersonating a government agency representative or misrepresenting governmental requirements
6. Impersonating a customer
7. Vendor unresponsive or no longer in business

b. Complaints Specific to Contracts

1. Unclear or misleading contract or lending terms
2. Falsifying customer authorization

c. Equipment Complaints

1. Equipment performance
2. Other related property damage

No cost information is required for this advice letter.

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

TIER DESIGNATION

Pursuant to OP 6 of D.18-09-044, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on February 2, 2019, 30 days after this advice letter is submitted.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
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P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Megan Caulson
Regulatory Tariff Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP31F
San Diego, CA 92123-1548
E-mail: mcaulson@semprautilities.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.14-07-002 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Nathanael Gonzalez at (626) 302-5150 or by electronic mail at Nathanael.Gonzalez@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan
 Phone #: (626) 302-2086
 E-mail: Darrah.Morgan@sce.com
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3932-E

Tier Designation: 2

Subject of AL: Proposed Methodology to Categorize and Quantify Solar Complaints Received in Compliance with Decision 18-09-044

Keywords (choose from CPUC listing): Compliance, Solar

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 18-09-044

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 2/2/19

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Gary A. Stern, Ph.D.
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
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Email: advicetariffmanager@sce.com

Name: Laura Genao c/o Karyn Gansecki
Title: Managing Director, State Regulatory Affairs
Utility Name: Southern California Edison Company
Address: 601 Van Ness Avenue, Suite 2030
City: San Francisco
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ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Evaluation + Strategy for Social	
Anderson & Poole	Innovation	
	GenOn Energy, Inc.	SCE
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
BART	Ritchie	
	Green Charge Networks	SPURR
Barkovich & Yap, Inc.	Green Power Institute	San Francisco Water Power and Sewer
Braun Blaising Smith Wynne	Hanna & Morton	Seattle City Light
P.C. CalCom Solar	ICF	Sempra Utilities
California Cotton Ginners & Growers Assn	International Power Technology	Southern California Edison Company
California Energy Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission	Kelly Group	Spark Energy
California State Association of Counties	Ken Bohn Consulting	Sun Light & Power
Calpine	Keyes & Fox LLP	Sunshine Design
Casner, Steve	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Cenergy Power	Linde	TerraVerde Renewable Partners
Center for Biological Diversity	Los Angeles County Integrated Waste	Tiger Natural Gas, Inc.
City of Palo Alto	Management Task Force	
	Los Angeles Dept of Water & Power	TransCanada
City of San Jose	MRW & Associates	Troutman Sanders LLP
Clean Power Research	Manatt Phelps Phillips	Utility Cost Management
Coast Economic Consulting	Marin Energy Authority	Utility Power Solutions
Commercial Energy	McKenzie & Associates	Utility Specialists
County of Tehama - Department of Public		
Works	Modesto Irrigation District	Verizon
Crossborder Energy	Morgan Stanley	Water and Energy Consulting
Crown Road Energy, LLC	NLine Energy, Inc.	Wellhead Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing
Day Carter Murphy		Communities Association (WMA)
	Office of Ratepayer Advocates	Yep Energy
Dept of General Services	OnGrid Solar	
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell		