

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6171E
As of May 18, 2021

Subject: Pacific Gas and Electric Company (PG&E) 1st Quarter 2021 Solar Complaint Trends
Information-Only Advice Letter

Division Assigned: Energy

Date Filed: 04-26-2021

Date to Calendar: 04-30-2021

Authorizing Documents: D1809044

Disposition:	Accepted
Effective Date:	04-26-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

April 26, 2021

Advice 6171-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company (PG&E) 1st Quarter 2021 Solar Complaint Trends Information-Only Advice Letter

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits via an information-only submittal a report on complaints received by PG&E from solar customers, in compliance with California Public Utilities Commission (CPUC) Decision (D.)18-09-044 *Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet*. This submittal covers the period from January 1, 2021 through March 31, 2021.

Background

California Assembly Bill (AB) 1070 (Gonzalez-Fletcher, approved October 11, 2017) requires, among other things, the Contractors State License Board (CSLB) to receive and review customer complaints regarding solar energy companies and solar contractors, and publish an annual report documenting these complaints beginning July 1, 2019. In Ordering Paragraph (OP) 6 of D.18-09-044, the CPUC directs the IOUs to support solar consumer protection efforts by proposing a method for categorizing and reporting to the CPUC, customer complaints related to solar on a quarterly basis — to be submitted in a Tier 2 advice letter within 90 days of issuance of the Decision per OP 7 of D.18-09-044.

On January 3, 2019, the Joint Investor Owned Utilities (IOU) submitted a Tier 2 Advice Filing — Southern California Edison Company (SCE) AL 3932-E, PG&E AL 5463-E, and San Diego Gas & Electric Company (SDG&E) AL 3320-E — proposing a method for tracking and reporting solar complaints on a quarterly basis to the CPUC. The California Solar & Storage Association (CALSSA) and Solar Energy Industries Association (SEIA) filed a protest on January 23, 2019 to these initial joint IOU submittals.

The IOUs received additional feedback from CPUC Energy Division staff that was informed in part by meetings staff had held with the CSLB on the CSLB's AB 1070 reporting requirements, along with feedback from the joint Solar Agency Task Force complaint working group. Based on this feedback, the IOUs submitted a joint

supplemental Tier 2 advice submittal — SCE AL 3932-E-A, PG&E AL 5463-E-A, and SDG&E AL 3320-E-A — on November 8, 2019 which replaced in full the prior submittal.

We will refer here to the supplemental joint submittal as the “Joint IOU Solar Complaint Categories Filing”.

CPUC Energy Division approved the Joint IOU Solar Complaint Categories Filing on September 24, 2020.

Per OP 7, within 90 days of the Energy Division approval of the Joint IOU Solar Complaint Categories Filing, the utilities are directed to submit quarterly information-only advice submittals to the Energy Division documenting solar complaint trends.

Complaints Received from PG&E’s Solar Customers

Pacific Gas and Electric Company (PG&E) submits this information-only advice submittal in compliance with D.18-09-044, to report on solar complaint trends. This submittal covers complaints received by PG&E from solar customers in PG&E’s service area between January 1, 2021 and March 31, 2021 (Q1 2021).

Complaint Tracking

PG&E has a specialized Solar Customer Service Center (SCSC) with teams that are staffed by senior Customer Service Representatives (CSRs). These CSRs are trained to support the specialized needs of solar customers related to Net Energy Metering billing, solar programs, and other services. PG&E’s SCSC CSRs record solar complaints received by phone from PG&E customers by submitting a pre-formatted email to a dedicated internal “Solar Complaints” mailbox. In that email form, CSRs mark the complaint category — per those approved in PG&E AL 5463-E-A — into which the complaint should be categorized.

The four complaint categories are provided below, with sub-categories:

A. Inappropriate Access to Customer Data

1. Solar company use of IOUs’ emergency help line to access customer data inappropriately
2. Solar company use of customers’ online My/Your Account portal or otherwise impersonating a customer

B. Misrepresentation or impersonation

1. Solar company impersonating an IOU representative or partner, misuse of IOUs’ brand or logo
2. Solar company impersonating a government agency representative

C. Equipment or Workmanship Complaints

1. Solar company unresponsive regarding equipment or workmanship issues
2. System never permitted to interconnect by applicable IOU

D. Other

1. Misrepresentation of solar contract terms
2. Other missing or incorrect solar documentation

Table 1 shows the number of complaints received by category during Q1 2021 (i.e. from Jan 1, 2021 to March 31, 2021). In Q1 2021, PG&E received a total of 117 complaints that fall into the categories approved per PG&E AL 5463-E-A.

Table 1. Solar Complaints Received by PG&E from Solar Customers in Q1 2021.

Category and Subcategory	# by Sub-Category	Total by Category
A. Inappropriate Access to Customer Data		8
1. Solar company use of IOU's emergency help line to access customer data inappropriately	1	
2. Solar company use of customers' online My/Your Account portal or otherwise impersonating a customer	7	
B. Misrepresentation or Impersonation		1
1. Solar company impersonating an IOU representative or partner, misuse of IOU's brand or logo.	0	
2. Solar company impersonating a government agency representative	1	
C. Equipment or Workmanship Complaints		50
1. Solar company unresponsive regarding equipment or workmanship issues	45	
2. System never permitted to interconnect by applicable IOU	5	
D. Other		58
1. Misrepresentation of solar contract terms	27	
2. Other missing or incorrect solar documentation	31	
Grand Total		117

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 17 2021, which is 21 days¹ after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

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

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

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this information-only advice submittal become effective upon date of submittal, which is April 26, 2021.

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 list for R.14-07-002. Address changes to the General Order 96-B service list should be directed to PG&E at email address 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. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.14-07-002



ADVICE LETTER 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 E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6171-E

Tier Designation: Info-Only

Subject of AL: Pacific Gas and Electric Company (PG&E) 1st Quarter 2021 Solar Complaint Trends Information-Only Advice Letter

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

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

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:

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: 4/26/21

No. of tariff sheets: N/A

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: N/A

Service affected and changes proposed¹: N/A

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

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: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Semptra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy