

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6375E
As of February 24, 2022

Subject: Pacific Gas and Electric Company (PG&E) 3rd Quarter 2021 Solar Complaint Trends
Information-Only Advice Letter

Division Assigned: Energy

Date Filed: 10-22-2021

Date to Calendar: 10-27-2021

Authorizing Documents: D1809044

Disposition:	Accepted
Effective Date:	10-22-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

October 22, 2021

Advice 6375-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company (PG&E) 3rd 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 July 1, 2021 through September 30, 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 July 1, 2021 and September 30, 2021 (Q2 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 Q3 2021 (i.e. from July 1, 2021 to September 30, 2021). In Q3 2021, PG&E received a total of 116 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 Q3 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		4
1. Solar company impersonating an IOU representative or partner, misuse of IOU's brand or logo.	4	
2. Solar company impersonating a government agency representative	0	
C. Equipment or Workmanship Complaints		70
1. Solar company unresponsive regarding equipment or workmanship issues	64	
2. System never permitted to interconnect by applicable IOU	6	
D. Other		34
1. Misrepresentation of solar contract terms	19	
2. Other missing or incorrect solar documentation	15	
Grand Total		116

Protests

*****Due to the COVID-19 pandemic, 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 **November 11, 2021**, which is 20 days 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:

Sidney Bob Dietz II
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 **October 22, 2021**.

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/

Sidney Bob Dietz II
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 (U 39 E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 6375-E

Tier Designation: information-only

Subject of AL: Pacific Gas and Electric Company (PG&E) 3rd 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: N/A

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: 10/22/21

No. of tariff sheets: 0

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: Sidney Bob Dietz II, 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	East Bay Community Energy Ellison Schneider & Harris LLP Energy Management Service Engineers and Scientists of California	Pioneer Community Energy Public Advocates Office
Alta Power Group, LLC Anderson & Poole		Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company
Atlas ReFuel BART	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF IGS Energy International Power Technology	SPURR San Francisco Water Power and Sewer Semptra Utilities
Barkovich & Yap, Inc. California Cotton Ginners & Growers Assn California Energy Commission	Intertie	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.
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McKenzie & Associates	
Cameron-Daniel, P.C. Casner, Steve Cenergy Power Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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		