

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



**Pacific Gas & Electric Company  
ELC (Corp ID 39)  
Status of Advice Letter 6924E  
As of June 12, 2023**

Subject: Pacific Gas and Electric Company (PG&E) 1st Quarter 2023 Solar Complaint Trends Information-Only Advice Letter

Division Assigned: Energy

Date Filed: 04-24-2023

Date to Calendar: 04-28-2023

Authorizing Documents: D1809044

|                        |                   |
|------------------------|-------------------|
| <b>Disposition:</b>    | <b>Accepted</b>   |
| <b>Effective Date:</b> | <b>04-24-2023</b> |

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

April 24, 2023

**Advice 6924-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) 1<sup>st</sup> Quarter 2023 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, 2023, through March 31, 2023.

**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 filings 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, 2023, and March 31, 2023 (Q1 2023).

### **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 20223 (i.e., from January 1, 2023, to March 31, 2023). In Q1 2023, PG&E received a total of 122 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 2023.

| Category and Subcategory   | # by Sub-Category | Total by Category |
|--|-------------------|-------------------|
| <b>A. Inappropriate Access to Customer Data</b>  |                   | <b>3</b>          |
| 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 | 2                 |                   |
| <b>B. Misrepresentation or Impersonation</b>   |                   | <b>0</b>          |
| 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                                      | 0                 |                   |
| <b>C. Equipment or Workmanship Complaints</b>  |                   | <b>77</b>         |
| 1. Solar company unresponsive regarding equipment or workmanship issues                                | 67                |                   |
| 2. System never permitted to interconnect by applicable IOU  | 10                |                   |
| <b>D. Other</b>  |                   | <b>42</b>         |
| 1. Misrepresentation of solar contract terms   | 27                |                   |
| 2. Other missing or incorrect solar documentation  | 15                |                   |
| <b>Grand Total</b>   |                   | <b>122</b>        |

### Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than May 15, 2023, which is 21<sup>1</sup> days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit

<sup>1</sup> Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, May 14, 2023.

E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
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 and 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 24, 2023.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically 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  
CPUC Communications

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: stuart.rubio@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) #: 6924-E

Tier Designation: info-only

Subject of AL: Pacific Gas and Electric Company (PG&E) 1st Quarter 2023 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: 4/24/23

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

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

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

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

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.  
Braun Blaising Smith Wynne, P.C.  
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  
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  
Downey Brand LLP  
Dish Wireless L.L.C.

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

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
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  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Stoel Rives LLP

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