

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 5, 2020

To the parties of Rulemaking (R.)14-07-002 and R.12-11-005:

***Subject: Deadline Extension for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Reconfigure their Interconnection Portals to Comply with D.20-02-011 Ordering Paragraphs 3 and 4***

On January 15, 2020, I sent a letter to the R.14-07-002 and R.12-11-005 service lists that extended the date by which the utilities must require solar providers to submit a wet customer signature on the California Solar Consumer Protection Guide from January 28, 2020 until the date that the relevant portions of Decision (D.)20-02-011 become effective.<sup>1</sup> During this extension period, the requisite signed pages may be signed by either a wet signature or an electronic signature.

On February 14, 2020, D.20-02-011 was issued. The Decision modifies portions of D.18-09-044, allows for electronic signatures on the Solar Consumer Protection Guide under certain conditions, and mandates changes to the utilities' interconnection process.

Ordering Paragraph (OP) 3 of D.20-02-011 states that “Within 120 days after the issue date of this decision, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company (together, the utilities) shall modify their interconnection portals to require the signed attestation page to be included with the initialed and signed pages of the solar information packet [i.e., the Solar Consumer Protection Guide], to be uploaded to the interconnection portal, for every interconnection application for which a signed solar consumer information packet is required... If a solar provider executes a contract with a residential customer for solar on or after 120 days after the issue date of this decision, the solar provider is required to include the signed attestation page in the same portable document file as the customer-initialed and signed pages of the solar information packet...”

OP 4 of the D.20-02-011 states that “(a) Within 120 days after the issue date of this decision, [the utilities] shall modify their interconnection portals to enable uploading of an audit trail document, and to require uploading of an audit trail document for every interconnection application for which a signed solar consumer information packet [i.e., the Solar Consumer Protection Guide] is required, unless the interconnection applicant indicates that the customer chose to sign the information packet in handwriting. The utilities shall modify their interconnection portals to enable interconnection applicants to indicate that the customer chose to sign the information packet in handwriting... If a solar provider executes a contract with a residential customer for solar on or after 120 days after the issue date of this decision, and if the customer chose to sign the solar

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<sup>1</sup> The January 15, 2020 letter referenced the then-Proposed Decision, which is now known as D.20-02-011.

information packet electronically, the solar provider is required to upload an audit trail document (and addendum, if applicable) containing all items identified in Section 3 of this decision...”

Since 120 days after the date of issuance falls on a Saturday (June 13, 2020), the deadline for implementation would be Monday, June 15, 2020.<sup>2</sup> D.20-02-011 allows the director of Energy Division or his/her/their designee to adjust this schedule if necessary to ensure efficient and cost-effective implementation.

On May 8, 2020, San Diego Gas & Electric (SDG&E) submitted a letter to CPUC Executive Director Alice Stebbins requesting an extension of the deadline to implement changes to September 30, 2021. The letter notes that D.18-08-008 authorized SDG&E’s plans to implement a new Customer Information System, which will “go live” on January 1, 2021. SDG&E then plans to implement a six month stabilization period following the rollout of the new system. During this period, SDG&E has stated that it cannot implement changes to their interconnection portal and as a result, would have to manually review applications in order to be in compliance with D.20-02-011. This will likely result in a dramatic increase in interconnection application processing times during the summer, which often sees a surge in rooftop solar installations.<sup>3</sup>

On September 30, 2020, the revisions to the Solar Consumer Protection Guide will become effective following an annual stakeholder feedback process. In order to ensure efficient and cost-effective implementation of the Ordering Paragraphs, it is reasonable that the signature requirements mandated by D.20-02-011 and the annual revisions to the Solar Consumer Protection Guide become effective the same day. Further, in order to maintain consistency across utilities it is reasonable that this extension apply to PG&E, SCE, and SDG&E.

Through this letter, I am extending the date by which the utilities must reconfigure their interconnection portals to comply with D.20-02-011 OP 3 and OP 4 from June 15, 2020 until September 30, 2020.

For questions regarding the extension established in this letter, please contact Christopher Westling in the CPUC’s Energy Division at [christopher.westling@cpuc.ca.gov](mailto:christopher.westling@cpuc.ca.gov).

Sincerely,

/s/ Simon Baker for

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division  
California Public Utilities Commission

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<sup>2</sup> California Public Utilities Commission Rules of Practice and Procedure, Rule 1.15  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

<sup>3</sup> See California Distributed Generation Statistics (DGStats) <https://www.californiadgstats.ca.gov>