

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 19, 2018

Advice Letter 5382

Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

SUBJECT: Proposed Modifications to the California Solar Initiative (CSI) – Thermal Program Industrial Application Project Incentive Cap, Commercial Pools Incentive Levels, and Other Program Handbook Criteria

Dear Mr. van der Leeden:

Advice Letter 5382 is effective as of December 19, 2018.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division



ADVICE LETTER SUMMARY



ENERGY UTILITY

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

Company name/CPUC Utility No.: Center for Sustainable Energy® (CSE)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Sephra Ninow

Phone #: (858) 244-1186

E-mail: sephra.ninow@energycenter.org

E-mail Disposition Notice to: sephra.ninow@energycenter.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

November 19, 2018

Advice Letter (AL) #: 94

Tier Designation: 2

Subject of AL: Proposed Modifications to the California Solar Initiative (CSI) – Thermal Program Industrial Application Project Incentive Cap, Commercial Pools Incentive Levels, and Other Program Handbook Criteria.

Keywords (choose from CPUC listing): Solar; Compliance; Rebates

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-01-035

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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: N/A

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: N/A

Resolution required? Yes No

Requested effective date: 12/19/18

No. of tariff sheets: 0

Estimated system annual revenue effect (%): 0

Estimated system average rate effect (%): 0

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: Proposed Modifications to the California Solar Initiative (CSI) – Thermal

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: Sephra Ninow
Title: Associate Director, Regulatory Affairs
Utility Name: Center for Sustainable Energy®
Address: 3980 Sherman Street, Suite 170 Zip: 92110
City: San Diego State: California
Telephone (xxx) xxx-xxxx: (858) 244-1177
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Email: sephra.ninow@energycenter.org

Name:
Title:
Utility Name:
Address:
City: State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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 | |

November 19, 2018

Advice No. 94
(Center for Sustainable Energy®)

Advice No. 4043-G
(Pacific Gas and Electric Company – U 39 E/G/M)

Advice No. 5382
(Southern California Gas Company – U 904 G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Modifications to the California Solar Initiative (CSI) – Thermal Program Industrial Application Project Incentive Cap, Commercial Pools Incentive Levels, and Other Program Handbook Criteria.

PURPOSE

Pursuant to Conclusion of Law (COL) 14 of California Public Utilities Commission (CPUC or Commission) Decision (D.)15-01-035,¹ the Center for Sustainable Energy® (CSE), on behalf of the California Solar Initiative (CSI)-Thermal Program Administrators (PAs),² submits this Advice Letter requesting modifications to the incentive cap for industrial application projects and commercial pools incentive levels. In accordance with these requested modifications, the PAs provide necessary revisions to the CSI-Thermal Program Handbook (Attachment A). The PAs also request CSI-Thermal Program Handbook changes to metering requirements for projects that include a water source heat pump, as well as to update contact information for CSE.

¹ D.15-01-035, *Decision Granting Petition for Modification of D.12-08-008 and D.13-08-004 Regarding Changes to the California Solar Initiative Thermal Program*, January 29, 2015, page 28, COL 14.

² The CSI-Thermal PAs are Pacific Gas and Electric Company (PG&E), CSE, and Southern California Gas Company (SoCalGas).

REQUEST TO RAISE INDUSTRIAL APPLICATION PROJECT INCENTIVE CAP

Procedural Background

On March 6, 2013, the Commission issued D.13-02-018, the *Decision to Modify Decision 10-01-022 to Expand Technologies Incentivized Under the California Solar Initiative Thermal Program*. D.13-02-018 authorized incentives for “process heat applications”, a technique that uses hot water as a medium for commercial end-use processes.³ Incentives for process heat application projects were to be paid out of the CSI-Thermal Program’s Multifamily/Commercial budget.

On July 23, 2014, the CSI-Thermal PAs and the California Solar Energy Industries Association (CALSEIA), now the California Solar and Storage Association (CALSSA), filed a joint Petition for Modification of D.12-08-008 and D.13-08-004 (Petition).⁴ The joint Petition requested, among other things, that the project incentive cap for Multifamily/Commercial projects be raised from \$500,000 to \$800,000.⁵ The Commission agreed that increasing the incentive cap would likely encourage more commercial installations and was reasonable.⁶ This project cap applied to all Multifamily/Commercial budget categories, including process heat applications.

In 2017, the California State Legislature passed Assembly Bill (AB) 797 (Stats. 2017, ch. 473), which directed the CSI-Thermal Program to reserve 10% of its total program budget for industrial applications. In compliance with AB 797, and on behalf of the CSI-Thermal PAs, SoCalGas submitted Advice Letter No. (AL) 5262-A, et al.,⁷ requesting modifications to the CSI-Thermal Program Handbook to include a definition for industrial applications and a budget reallocation of 10% of each PA’s total remaining budget for industrial applications.⁸ SoCalGas AL 5262-A, et al., became effective May 24, 2018.

SoCalGas AL 5262-A, et al., established that industrial application projects must use process heating to produce basic materials and commodities to qualify for incentives.⁹ Moreover, because industrial application projects were previously eligible for incentives under the existing Multifamily/Commercial budget, the \$800,000 per project incentive cap was carried over from the Multifamily/Commercial budget and applied to the Industrial Applications budget as well.¹⁰

³ See D.13-02-018 at 22, COL 5 at 38.

⁴ See R.12-11-005, *Petition of the CSI-Thermal Program Administrators and the California Solar Energy Industries Association for Modification of D.12-08-008 and D.13-08-004 Regarding the CSI-Thermal Program*, July 23, 2014 (Petition).

⁵ *Id.* at 17-18.

⁶ D.15-01-035 at 22, COL 10 at 27.

⁷ SoCalGas AL 5262-A/PG&E 3942-G-A/CSE 88-A, submitted April 24, 2018 and effective May 24, 2018 (SoCalGas AL 5262-A, et al.).

⁸ SoCalGas AL 5262-A, et al., Attachment A, *California Solar Initiative Thermal Program Handbook (Redlined)*, Rev 19.0, May 2018.

⁹ *Id.* at 55.

¹⁰ See *Id.* at 59 (An \$800,000 cap was applied to the Industrial Applications Budget).

To date, only one project that uses process heat for industrial applications has been allocated incentives. Due to the lack of applications for industrial application incentives, the PAs requested program stakeholders provide information on potential industrial application projects, including incentive levels that stakeholders believed would be required to make industrial application projects financially viable. We discuss this program stakeholder feedback below.

Industrial Applications Budget Incentive Cap Analysis

The PAs received examples of industrial application project quotes from all three PA program territories. The requested CSI-Thermal incentives for these projects ranged from \$1.3 - \$7.3 million and were based on site energy demand and available collector area. The CSI-Thermal Program's total Industrial Applications budget would allow only a limited number of projects under these proposals.¹¹

When considering alternatives to the existing maximum incentive cap of \$800,000, the PAs aimed to balance the limited available funds and high incentive levels required for financial viability against the CSI-Thermal Program goal of incentivizing as many projects as possible. Furthermore, the PAs find value in retaining simple and straightforward criteria for incentive levels, rather than developing more complicated methodologies that could result in industry confusion and frustration.

Thus, the PAs find that capping any one specific industrial application project to 50% of each PA's original Industrial Applications budget for PG&E and SoCalGas and eliminating the maximum incentive cap for CSE strikes the right balance of providing transparent, easy-to-understand program rules with providing incentives that should generate participation in the industrial sector. The Industrial Applications budget and maximum incentive per project would be as follows:

| Program Administrator | Industrial Applications Budget | Maximum Incentive Per Project |
|-----------------------|--------------------------------|-------------------------------|
| PG&E | \$5,161,745 | \$2,580,873 |
| SoCalGas | \$3,893,198 | \$1,946,599 |
| CSE | \$1,030,802 | \$1,030,802 |

In the case of CSE, capping a single industrial application project at 50% of the original budget (\$515,401) would effectively lower the \$800,000 cap and make Industrial Applications funds even more difficult to access. Accordingly, CSE's industrial application project cap should be lifted entirely so that incentives are provided in proportion with available incentives in other CSI-Thermal Program territories.

¹¹ The current CSI-Thermal Program combined Industrial Applications budget for all territories is \$10,085,745.

If the Industrial Applications budget subsequently becomes exhausted, projects that meet the definition of an industrial application may still be eligible to apply for CSI-Thermal Program funds under the Multifamily/Commercial budget or the Low-income/Disadvantaged Communities budget and subject to the existing \$800,000 incentive cap.

Summary

Accordingly, CSE, on behalf of the CSI-Thermal PAs, pursuant to COL 14 of D.15-01-035, hereby respectfully requests that the maximum incentive for any one specific industrial application project be adjusted to 50% of the original Industrial Applications budget for PG&E and SoCalGas and that the maximum incentive cap for industrial applications be removed entirely for CSE.

REQUEST TO RAISE COMMERCIAL POOLS INCENTIVES AND RETAIN CAP

Procedural Background

In 2013, the Commission set the CSI-Thermal Commercial Pools incentive rate at \$7.00 per estimated “therm” displaced.¹² In 2014, the CSI-Thermal PAs submitted CSE AL 51, et al.,¹³ contending that the \$7.00/therm rate was overly generous due to a dramatic climb in commercial pool incentive applications. It was also found that commercial solar pool heating systems were costing half the original estimate, resulting in the full subsidization of many systems. The PAs maintained that by reducing the incentive to \$5/therm, more funds would be available for more installations, resulting in a higher number of therms displaced for the program overall.¹⁴ The Commission agreed with the PAs and CSE AL 51, et al. was approved and effective December 1, 2014.¹⁵

On July 23, 2014, a Petition for Modification was filed jointly by the CSI-Thermal PAs and CALSEIA, now CALSSA, to introduce, among other things, an incentive cap for solar pool heating systems in CSI-Thermal.¹⁶ The PAs and CALSSA explained that when the commercial pool incentives were first provided in the CSI-Thermal Program, there was considerable uncertainty surrounding how much these systems would cost. The PAs later found that system costs varied considerably and were lower than expected. As of June 16, 2014, 97 solar pool heating system applications had been submitted. Of those systems, 56% covered 100% of the system cost, and only 19% covered less than 50% of the system costs.

¹² D.13-08-004, *Decision to Incorporate Solar Pool Heating Systems into the California Solar Initiative – Thermal Program*, August 15, 2013, COL 2 at 21.

¹³ CSE AL 51/SoCalGas AL 4682/PG&E AL 3503-G/SCE AL 3096-E (CSE AL 51, et al.), submitted August 20, 2014 and effective December 1, 2014.

¹⁴ *Id.* at 2-3.

¹⁵ See Commission Disposition of CSE AL 51, et al., at 5, December 1, 2014.

¹⁶ Petition at 18-19.

Thus, to limit excessive payouts, the PAs and CALSSA requested a cap on incentive payouts equaling 50% of the cost of the system. The Commission agreed that the cap was reasonable to guard against excessive system payouts and adopted a 50% cap for solar pool heating systems in D.15-01-035.¹⁷

On March 21, 2018, CALSSA, on behalf of the solar pool heating collector manufacturers, requested that the CSI-Thermal Program return the commercial pool incentive level to \$7/therm for the duration of the CSI-Thermal Program and increase the maximum incentive cap to 75% of total system cost. CALSSA cites reduced participation in the solar pool heating portion of the CSI-Thermal Program as justification for increasing incentives and asserts that a higher incentive level and project cap will allow greater participation in coastal areas, where more pools exist but where weather has a significant effect on incentive calculator results.

Analysis for Raising Commercial Pools Incentive Level

To assess whether participation declined for commercial pool incentives, the PAs used publicly available program data regarding the 792 solar pool heating systems that received an incentive payment or had an existing reservation as of June 30, 2018. The PAs define “program participation” as the number of projects that entered “Reservation: Application Review” status during a given calendar quarter. This status best represents how many commercial pools projects entered into contract during the previous period and should most accurately reflect current commercial pools market activity and trends.

The analysis revealed applications for commercial pools incentives receded dramatically after incentives were reduced from \$7/therm to \$5/therm in December 2014, and incentives were capped at 50% of total system cost in January 2015 (See Figure 1 below).

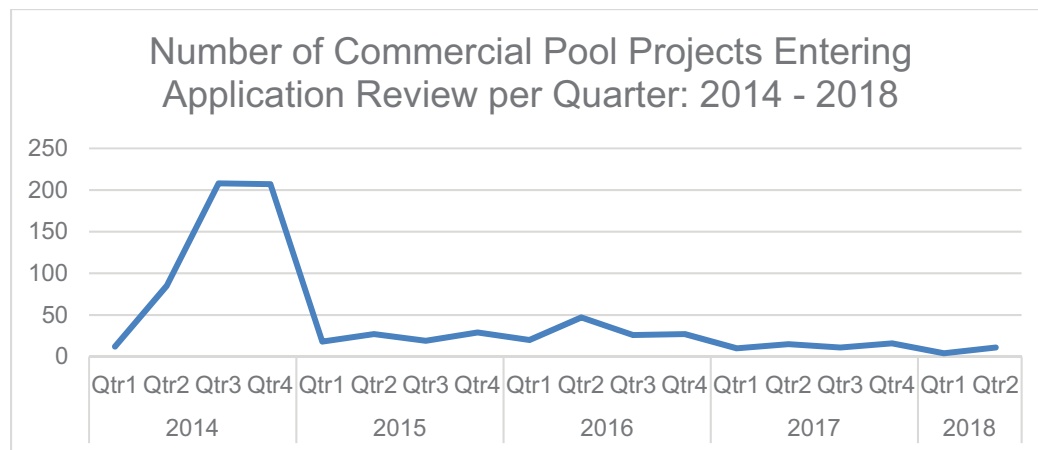


Figure 1-Participation in the CSI-Thermal Program Commercial Pools Budget Category by Quarter

¹⁷ D.15-01-035 at 23, COL 13 at 28.

Following the reduction of incentives from \$7/therm to \$5/therm, program participation was steady in 2015 and 2016, with 93 and 120 reservation requests submitted, respectively. 2017 saw this number approximately halve to 52 reservation requests. The first half of 2018 saw only 15 commercial pool projects enter Application Review.

Accordingly, the PAs agree with CALSSA that program participation in the commercial pools budget category has declined and that a higher incentive level may encourage more appropriate levels of participation. In particular, a higher incentive level should be especially effective at boosting participation of commercial pools applications in coastal climate zones where the expected performance of solar thermal systems is negatively impacted by lower ambient air temperatures and stronger prevailing winds. The following example from a commercial pool project in PG&E's program territory (PGE-005709) explains how raising the commercial pools incentive level could facilitate more installations in coastal climate zones.

Example:

Project PGE-005709 was constructed in Inland CEC Climate Zone 12, had a total project cost of \$15,280, received an incentive of \$7,640 (capped at 50% of system cost), and should produce annual energy savings of 1,866 therms. The project has an estimated simple payback of 3.4 years, based on dividing the out-of-pocket cost (total project cost – incentive amount) by the estimated annual utility bill savings (estimated annual energy savings multiplied by an assumed \$1.20/therm cost of natural gas).

Based on a simulation using the TRNSYS¹⁸ calculator at www.csithermal.com, if this same project had been installed in the Coastal CEC Climate Zone 03, the system would produce significantly less energy savings (1,263 therms). This would have resulted in an incentive payout of \$6,315 (41% of total project cost). The increased out-of-pocket costs combined with lower annual energy savings would have pushed the estimated simple payback of this system from 3.4 years to 6.0 years. Conversely, if this project were provided the proposed \$7/therm incentive level, this project's incentive would reach the 50% cap, and simple payback would be improved to 5.0 years.

While a higher incentive level will also increase calculated rebate amounts in inland climate zones, the risk of excessively high payouts is mitigated by retaining the incentive cap at 50% of total project cost, as discussed below.

Analysis for Retaining Commercial Pools Incentive Cap

Capping the incentives for commercial pools is necessary to avoid excessive payouts and ensure natural gas savings. Commercial pools incentives are unique in the CSI-Thermal Program in that they do not require that the Host Customer possess an existing natural gas pool heating system, only that the Host Customer have natural gas service.

¹⁸ The Transient System Simulation Tool (TRNSYS) is an extremely flexible graphically based software environment used to simulate the behavior and performance of transient systems such as thermal and electrical energy installations.

This exception exists so that pool owners are incentivized to install solar thermal pool heating systems instead of additional natural gas systems. However, to prevent abuse of this exception and only reach customers who truly intend to install pool heating systems, incentives are capped at a certain percentage of the total solar pool heating system costs.

The CSI-Thermal Program currently caps incentives at 50% of total project cost, requiring the Host Customer to contribute at least 50% of the solar thermal pool heating project costs. In evaluating whether the request to increase the incentive cap to 75% is justified, the PAs used public export data to estimate the expected simple payback period [which we use as a proxy for return on investment (ROI)] for pool systems where the incentive was capped at 50% of total project cost (n=73).¹⁹ To estimate simple payback, the PAs used the following formula:

$$\text{Expected simple payback (yrs.)} = \frac{(\text{Total project cost} - \text{Incentive amount})}{\text{Expected annual energy savings (therms)} * \$1.20}$$

The formula represents the out-of-pocket cost to the Host Customer, divided by the expected annual utility bill savings, and assumes an average cost of natural gas of \$1.20/therm. Figure 2 below shows a subset of commercial pools projects in the CSI-Thermal public export data, with Columns H, I and J added for this analysis.

| A | G | H | I | J | K | N | BS |
|------------------|--------------------------|---|--|--------------------------------|---------------------------|---|--------------------|
| Application Code | Current Incentive Amount | % of Total System Cost Covered by Incentive | Assumed cost of natural gas (\$/therm) | Expected simple payback (yrs.) | Incentive Rate (\$/therm) | Expected Annual Energy Savings [therms] | Total Project Cost |
| SCG-004121 | \$8,790 | 50.00% | \$1.20 | 3.87 | \$5.00 | 1894 | \$17,580 |
| SDG-004122 | \$5,250 | 50.00% | \$1.20 | 2.69 | \$5.00 | 1629 | \$10,500 |
| SDG-004491 | \$20,305 | 50.00% | \$1.20 | 3.87 | \$5.00 | 4377 | \$40,610 |
| PGE-004512 | \$13,165 | 50.00% | \$1.20 | 3.64 | \$5.00 | 3014 | \$26,330 |
| SCG-004573 | \$10,125 | 50.00% | \$1.20 | 2.90 | \$5.00 | 2914 | \$20,250 |
| PGE-004587 | \$9,668 | 50.00% | \$1.20 | 3.95 | \$5.00 | 2041 | \$19,336 |
| SDG-004633 | \$10,419 | 50.00% | \$1.20 | 3.06 | \$5.00 | 2841 | \$20,839 |
| SCG-004636 | \$7,262 | 50.00% | \$1.20 | 3.25 | \$5.00 | 1862 | \$14,524 |
| SCG-004642 | \$6,778 | 50.00% | \$1.20 | 3.26 | \$5.00 | 1734 | \$13,556 |
| SCG-004674 | \$2,400 | 50.00% | \$1.20 | 3.06 | \$5.00 | 654 | \$4,800 |
| SCG-004675 | \$5,250 | 50.00% | \$1.20 | 2.92 | \$5.00 | 1497 | \$10,500 |
| SCG-004691 | \$5,400 | 50.00% | \$1.20 | 2.47 | \$5.00 | 1825 | \$10,800 |
| SCG-004700 | \$11,400 | 50.00% | \$1.20 | 2.98 | \$5.00 | 3193 | \$22,800 |
| SCG-004717 | \$4,316 | 50.00% | \$1.20 | 3.84 | \$5.00 | 937 | \$8,632 |
| SCG-004719 | \$7,754 | 50.00% | \$1.20 | 3.39 | \$5.00 | 1908 | \$15,508 |
| SCG-004722 | \$9,350 | 50.00% | \$1.20 | 3.75 | \$5.00 | 2077 | \$18,700 |
| SCG-004736 | \$5,800 | 50.00% | \$1.20 | 2.51 | \$5.00 | 1923 | \$11,600 |

Figure 2 - A subset of CSI-Thermal public export data illustrating the calculation of simple payback. Note: Columns H, I and J have been added to perform calculations for this exercise. Some columns in the public export data have been hidden to improve readability.

¹⁹ Where “n” represents 73 Commercial Pool projects that were incentivized at \$5/therm and the incentive was capped at 50% of total project cost.

This analysis found average and median simple payback of 3.4 and 3.5 years for 73 commercial pool systems with incentives capped at 50% of total project cost. These simple payback numbers are well below the 5-year ROI that CALSSA suggested was an acceptable motivator for investment in solar thermal systems.²⁰ Simply stated, the PAs should have found much longer simple payback numbers for more systems if the current cap were overly restrictive.

Accordingly, the PAs find that retaining the 50% project cost cap is an important safeguard against excessive payouts for installation of solar thermal pool heating systems but still allows for acceptable ROI.

Summary

Declining participation rates but acceptable ROI for projects hitting the incentive cap of 50% of total system cost suggests that the CSI-Thermal commercial pools program may have exhausted the inland and warmer climate zone pools market. Pools in these warmer climate zones typically have higher anticipated performance and are thus able to achieve incentive levels at or above 50% of total project cost at an incentive rate of \$5/therm.

Increasing the incentive rate to \$7/therm but maintaining the cost cap at 50% should allow commercial pool systems in less favorable climate zones to attain higher rebates and a more acceptable ROI while retaining important safeguards against excessive payouts.

Accordingly, CSE, on behalf of the CSI-Thermal PAs, pursuant to COL 14 of D.15-01-035, hereby respectfully requests that the CSI-Thermal commercial pools incentive rate be raised to \$7/therm and that the 50% cost cap be retained.

PROPOSED CSI-THERMAL PROGRAM HANDBOOK REVISIONS

The proposed revisions to the CSI-Thermal Program Handbook, to be reflected in the December 2018 CSI-Thermal Program Handbook, are summarized below and included as Attachment A to this submittal:

- Section 1.4 and Appendix I were amended to reflect updated contact information for CSE.
- Sections 1.4, 2.5.2, 3.3.3, 3.5.2, 4.3.3, 4.5.2, 5.3.1, 5.5.2, 12.2.2.2, 12.2.2.3, and 13 have been amended to reflect the updated website address for <http://gosolarcalifornia.org>.
- Table 21 was amended to reflect the modified commercial pools incentive level.
- Sections 4.3.1, 4.3.3, and Table 16 were amended to reflect the modified maximum incentive for industrial application projects.

²⁰ See D.13-08-004 at 6: "Based on the experience of its membership, CALSEIA believes facility owners and managers will choose not to make such expenditures unless the return on investment is five years or less."

- Table 15 was corrected to reflect the compression from four to two steps of the General Market Multifamily/Commercial budget, which was approved in SoCalGas AL 5262-A, et al.
- Section 4.1.5 was added to include metering requirements for PBI projects that include a water source heat pump. This new requirement for metering on the collector loop is to ensure that CSI-Thermal incentives are only paid toward contributions from the solar thermal system and not from any downstream heat pumps or other energy efficiency devices.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, this Advice Letter is submitted with a Tier 2 designation.

PROTESTS

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than December 10, 2018, which is twenty (21)²¹ days after the submittal of this Advice Letter. Protests should be mailed to:

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

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

A copy of the protest should also be sent via e-mail and U.S. mail to CSE at the address shown below on the same date it is mailed or delivered to the Commission:

Sephra Ninow
Associate Director, Regulatory Affairs
Center for Sustainable Energy®
3980 Sherman St., Suite 170
San Diego, CA 92110
E-mail: sephra.ninow@energycenter.org

²¹ The twentieth day after the submittal of this Advice Letter falls on Sunday, December 9, 2018. Rule 1.14 of the CPUC Rules of Practice & Procedure, provides that “[i]f the last day falls on a Saturday, Sunday, holiday or other day when the Commission offices are closed, the time limit is extended to include the first day thereafter.” Thus, the time limit for protests to this Advice Letter is extended to Monday, December 10, 2018.


There are no restrictions as to who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

EFFECTIVE DATE

CSE requests that this Advice Letter become effective on regular notice, December 19, 2018, which is thirty (30) calendar days after the date of submittal.

NOTICE

CSE is providing a copy of this Advice Letter to service list R.12-11-005.



Sephra A. Ninow, J.D.
Associate Director, Regulatory Affairs
Center for Sustainable Energy®

Attachments: Attachment A –Notice of Availability of Proposed CSI-Thermal Program Handbook, Rev. 19, December 2018.

cc: Service List R.12-11-005

Notice of Availability

On behalf of the California Solar Initiative-Thermal (CSI-Thermal) Program Administrators, please find CSE Advice Letter 94 / SoCalGas Advice Letter 5382 / PG&E Advice Letter 4043-G, a submittal to propose modifications to the CSI-Thermal Program industrial application project incentive cap, commercial pools incentive levels, and other program handbook criteria.

Due to the size of Attachment A, the Redline CSI-Thermal Program Handbook illustrating proposed amendments, a hard copy was not included. We instead provide notice that Attachment A may be viewed at:

https://energycenter.org/sites/default/files/docs/nav/policy/proposed/181119_CSE_CIST_AL94_Attachment%20A_Handbook.pdf

If you would like to request a hard copy of the Redline CSI-Thermal Program Handbook illustrating proposed amendments, please contact Sephra Ninow via e-mail at sephra.ninow@energycenter.org or via telephone at 858-244-1186.

Thank you!

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program and
Other Distributed Generation Issues.

RULEMAKING 12-11-005
(Filed November 8, 2012)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this *CSE Advice Letter 94*, on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.12-11-005 or by delivering a copy via U.S. First Class mail to those members of the current service list for R.12-11-005 with no or undeliverable email addresses.

Executed on November 19, 2018, in San Diego, CA.



Kinshuk Chatterjee
Regulatory Analyst
Center for Sustainable Energy®
3980 Sherman St., Suite 170
San Diego, CA 92110
Tel: (858) 244-1177
kinshuk.chatterjee@energycenter.org



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

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LIST NAME: LIST
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Parties

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