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VIA E-MAIL
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DOCKET
06-NSHP-1
DATE DEC 23 2011
RECD. DEC 27 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 06-NSHP-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: **New Solar Homes Partnership**: PG&E Request to Delay Adoption of New Solar Homes Partnership Guidebook Revisions

Pacific Gas and Electric Company ("PG&E") respectfully requests that the California Energy Commission ("CEC") delay its adoption of proposed revisions to the New Solar Homes Partnership Guidebook, Fourth Edition ("Guidebook"). This item is currently scheduled for consideration at the January 11, 2012 business meeting.

PG&E asks for this delay for several reasons. Fundamentally, PG&E is concerned with the timing of the Guidebook revisions, given the uncertainty surrounding the future of the program and its administration. PG&E requests that further action on this item be deferred until after the California Public Utilities Commission ("CPUC") conducts its in-depth program evaluation of the New Solar Homes Partnership ("NSHP") activities and more is known about the future of this program.

Revising the NSHP Guidebook now will greatly impact our customers and cause significant confusion about the status of their applications. In just the last few months, our customers have seen the incentive levels reduced, the creation of a waiting list, and the sunset of the program on December 31, 2011, given the Public Goods Charge was not renewed by the legislature. Revising the Guidebook now, where the revisions should be applicable prospectively only, makes little sense at this time, given the NSHP's status.

PG&E suggests that our focus today should be on the timely processing of pending applications. For example, as of this week, PG&E has 110 reservations and 95 payments pending approval by the CEC and most of these customers call us weekly to check on the status of their project. Changing the guidelines now will likely disqualify a number of projects in the pipeline (i.e., signed contracts and already-installed PV systems). Because there is no correction

period for incomplete applications and applicants are directed to re-apply, customers may be stranded in the process as they would have to re-apply under the new guidelines and conditions, which will make some of them ineligible for the incentives. For example, applications not submitted before certificate of occupancy ("COO") or with solar permits not issued before the COO would all be adversely affected by the adoption of the new Guidebook. Furthermore, adoption of the new Guidebook will mean a new CEC PV calculator and new NSHP web tool release, which will require retraining of program administrators and customers, as well as likely increases in inquiries and complaints, all of which will detract from the timely processing of pending applications and claims. This increased administrative burden for customers and administrators at this point in the program makes little sense.

Thank you for your consideration of these comments. PG&E has been an active participant in developing the proposed revisions; however, given the current program circumstances, PG&E does not believe now is the time to implement these revisions.

Please contact me or Maggie Dimitrova (415/973-7940) with any questions you may have.

Sincerely,

Valerie J. Winn

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