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Honesto Gatchalian and Maria Salinas
Energy Division
California Public Utilities Commission
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cc:
Megan Caulson
San Diego Gas & Electric
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Subject: FIT Coalition Comments on SDG&E Solar Photovoltaic Program

Dear Mr. Gatchalian and Ms. Salinas,

The FIT Coalition submits the following comments on Advice Letter 2211-E, San Diego Gas & Electric's (SDG&E) request for Commission approval of implementation and administration details for the PPA portion of its Solar Photovoltaic Program (SPVP).

The FIT Coalition is a California-based group focused on smart renewable energy policy. We advocate primarily for vigorous feed-in tariffs and "wholesale

distributed generation,” which is generation that connects to distribution lines close to demand centers. Our members are active in proceedings at the Public Utilities Commission, Air Resources Board, Energy Commission, California ISO, the California Legislature, Congress, the Federal Energy Regulatory Commission, and in various local governments around California.

In the section titled “PROCESS FOR IDENTIFYING SUGGESTED LOCATIONS TO INTERCONNECT” and Appendix A, SDG&E describes the information it anticipates making available in order to help Respondents determine the interconnection potential of a project location. The FIT Coalition is very supportive of SDG&E’s efforts to promote Grid Transparency and is encouraged by the detailed information SDG&E plans to make available. We have a few clarifying questions and comments:

1. Most importantly, the FIT Coalition would like to see more information on what is meant by “Available Generation Capacity”, which is described as “the maximum amount of PV generation allowable on the circuit.” How is this number calculated? If a formula is used, can it be provided? If it is subjective, can we get an in-depth description of the analytical process?
2. Why is this information limited to 12 kV lines? There are higher voltage lines on the SDG&E distribution system that are of interest to smaller developers (SDG&E controls up to 69 kV lines). For example, PG&E’s SPVP map provides information for both 12KV and 21KV lines:

<http://www.pge.com/b2b/energysupply/wholesaleelectricssuppliersolicitation/PVRFO/pvmap/>

The FIT Coalition recommends that this information be made available for all SDG&E-controlled lines.

3. We also encourage SDG&E to link this information with their WDAT queue information so that developers will be able to take into consideration projects in

queue ahead of them when examining possible interconnection locations. This information can either be provided in the queue (listing the relevant substation or circuit for each interconnection request) or as a column in the spreadsheets that will accompany the maps.

4. We encourage SDG&E to provide information on the size and timing of planned distribution system upgrades and load additions that will impact "Available Generation Capacity."

We look forward to working with the Commission and SDG&E to better understand these issues.

Submitted December 21, 2010

/s/

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