

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California
Edison Company (U338-E) for
Authority to Implement and Recover in
Rates the Cost of its Proposed Solar
Photovoltaic (PV)
Program.

Application No. 08-03-015

CLEAN COALITION COMMENTS ON SOLAR ENERGY INDUSTRIES
ASSOCIATION PETITION FOR MODIFICATION OF DECISION 09-06-049
AND 12-02-035

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July 10, 2013

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The Clean Coalition respectfully submits this response to SEIA's Petition for Modification (PFM), pursuant to Rule 16.4.

The Clean Coalition is a California-based nonprofit organization whose mission is to accelerate the transition to local energy systems through innovative policies and programs that deliver cost-effective renewable energy, strengthen local economies, foster environmental sustainability, and enhance energy security. To achieve this mission, the Clean Coalition promotes proven best practices, including the vigorous expansion of Wholesale Distributed Generation (WDG) connected to the distribution grid and serving local load. The Clean Coalition drives policy innovation to remove major barriers to the procurement, interconnection, and financing of WDG projects and supports complementary Intelligent Grid (IG) market solutions such as demand response, energy storage, forecasting, and communications. The Clean Coalition is active in numerous proceedings before the California Public Utilities Commission and other state and federal agencies throughout the United States in addition to work in the design and implementation of WDG and IG programs for local utilities and governments.

The Clean Coalition fully supports the PFM and we urge the Commission to grant the relief requested. We note as additional evidence in favor of the PFM that with the Commission's decision in D.13-05-033, to shift an additional 34 MW from the SPVP to the RAM program, the need for SCE to stay on schedule with its remaining SPVP allocation is exacerbated. We were not supportive of D.13-05-033, due to our strong concerns that such program changes undermine the sustained activities of developers, who need multiple years to ramp up for a new

program, by changing the rules “midstream.” Accordingly, we urge the Commission to be specific in its direction to SCE with respect to its procurement schedule for the MW remaining in the IPP portion of its SPVP.

Again, we urge the Commission to grant the relief requested by SEIA.

Respectfully submitted,

TAM HUNT

A handwritten signature in black ink, appearing to read 'TH', with a long horizontal flourish extending to the right.

July 10, 2013