

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Update  
Distribution Level Interconnection Rules and  
Regulations.

Rulemaking 25-08-004

**REPLY COMMENTS OF  
THE SOLAR ENERGY INDUSTRIES ASSOCIATION  
AND CLEAN COALITION  
TO INVESTOR-OWNED UTILITIES RESPONSES TO  
ADMINISTRATIVE LAW JUDGE'S RULING DIRECTING  
UTILITIES TO PRODUCE RULE 21 APPLICATION DATA**

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August 28, 2026

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**REPLY COMMENTS OF  
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Pursuant to the California Public Utilities Commission’s (“Commission”) *Administrative Law Judge’s Ruling Directing Utilities to Produce Rule 21 Interconnection Application Data* (“Ruling”), dated July 14, 2026, and the *Email Ruling Granting Investor-Owned Utilities’ Request for Deadline Extension*, dated July 24, 2026, the Solar Energy Industries Association (“SEIA”) and Clean Coalition (collectively, the “Joint Parties”) reply to the investor-owned utilities (“IOUs”) responses filed in the above captioned proceeding on August 11, 2026.

**I. INTRODUCTION**

The Scoping Memo in this proceeding directed the IOUs to answer the following :

What are the costs associated with interconnecting non-NEM resources? Does the current \$800 interconnection fee cover these costs? If the costs vary based on certain characteristics (e.g., generating technology or project size), separate your responses into the appropriate buckets. If the data are not available, what steps are necessary to collect this data? <sup>1</sup>

The IOUs’ responses to this inquiry, provided through their April 30, 2026 comments in this docket, were blatantly deficient, all claiming that they did not have the necessary project level costs data to be responsive to the Commission’s inquiry.<sup>2</sup> In SEIA’s reply to the April 30th

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<sup>1</sup> *Assigned Commissioner’s Scoping Memo and Ruling*, R.25-08-004 (March 3, 2026) Appendix, p. 4.

<sup>2</sup> *Opening Comments of Southern California Edison Company on Assigned Commissioner’s Scoping Memo and Ruling*, R. 25-08-004 (April 30, 2026), p. 29; *Pacific Gas and Electric Company*

IOU submissions it noted that the IOUs' claimed lack of project level data was questionable at best as the IOUs were directed in D. 20-09-035 "to track the *actual costs* associated with the processing of interconnection applications [for nonnet energy metering systems] and report the data."<sup>3</sup> Thus, SEIA requested that the Commission issue a ruling directing the IOUs to provide:

actual cost data for the interconnection of non-NEM projects broken down by size and technology. In connection therewith, the IOUs should be required to clearly lay out each step in the interconnection application review process and specify a cost for each step based on the type/size of the technology being interconnected. This data should be limited to applications processed in the past two years so as to take account for efficiencies in processing that have occurred overtime..<sup>4</sup>

SEIA was thus appreciative of the Commission's July 14, 2026 Ruling directing the IOUs to provide a level of cost granularity for the interconnection application process for non-NEM systems that would allow for an equitable determination of the appropriate interconnection application fee. Unfortunately, the responses provided by the IOUs through their August 11, 2026 submissions do not provide the level of granularity sought. One after another they proclaimed that they do not have systems capable of time tracking project-level data necessary to determine the actual end-to-end labor hours and costs associated with the processing of non-NEM interconnection requests..<sup>5</sup> What is provided are rudimentary estimates that raise more

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*Opening Comments on Assigned Commissioner's Scoping Memo and Ruling R. 25-08-004 (April 30, 2026) ("PG&E Scoping Memo Comments") pp. 19-21; Opening Comments of San Diego Gas & Electric Company on Assigned Commissioner's Scoping Memo and Ruling, R. 25-08-004 (April 30, 2026), p.14.*

<sup>3</sup> D. 20-09-035, p. 49 (emphasis added).

<sup>4</sup> *Reply Comments of the Solar Energy Industries Association in Response to Assigned Commissioner's Scoping Memo and Ruling, R. 25-08-004 (May 20, 2026), p. 38.*

<sup>5</sup> *Southern California Edison Company's Responses to Questions on Assigned Commissioner's Ruling on Interconnection Fees, R. 25-08-004 (August 11, 2026) ("SCE Responses"), p. 1; Response of San Diego Gas & Electric Company to Administrative Law Judge's Ruling Directing Utilities to Produce Rule 21 Interconnection Application Data, R. 25-09-004 ("SDG&E Response"), pp. 1-2; Pacific Gas and Electric Company Response to Administrative Law Judge's Ruling Directing Utilities to Produce Rule 21 Interconnection Application Data. R. 25-08-004 (August 11, 2026) ("PG&E Response") , pp. 1-2.*

questions than provide answers and make clear that the IOUs have not been compliant with the directives of D. 20-09-035 to track the “actual costs” of processing these interconnection applications. As such, the current record cannot support a fee increase, nor can the existing \$800 fee be presumed reasonable for all project types and sizes where the IOUs have failed to provide the cost differentiation expressly sought by the Commission.

Given these deficiencies, the Joint Parties’ comments on the IOUs’ submissions are intended to highlight for the Commission the deficiencies in the manner in which the IOUs have estimated the costs and to illustrate that the “one size fits all” approach being advanced by the IOUs is not reflective of the costs to interconnect the vast majority of non-NEM installations and, therefore, basing fees off such estimates would be inequitable to consumers. As even PG&E recognized:

The non-Net Energy Metering (non-NEM) Rule 21 portfolio encompasses a broad range of projects within the rapidly evolving landscape of interconnections. These project types include everything from small residential stand-alone battery systems or non-export solar additions to large transmission level customers interconnecting multiple generating technologies at one interconnection point while participating in multiple incentive and tax-based programs. Considering this evolution, and the time that has *elapsed since interconnection fees for non-NEM systems were previously set, re-evaluating the fee structure is appropriate to ensure a fair and equitable allocation across varying system sizes and complexities, while maintaining alignment with cost-causation principles.*<sup>6</sup>

The Joint Parties wholeheartedly agree with PG&E. Evaluating the fee structure to ensure a fair and equitable allocation across varying system sizes and complexities necessitates that the Commission must once again go back to the well and compel the IOUs to provide data which will in fact allow for the calculation of reasonable application fees for non-NEM installations.

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<sup>6</sup> PG&E Scoping Memo Comments, p. 19.

## **II. THE IOUS' COST ESTIMATES ARE RIDDLED WITH DEFECTS**

The Ruling asks the IOUs to provide a breakdown of staff hours required to process a non-NEM application and the implied cost of the estimated staff hours, with costs differentiated by relevant project characteristics. Each IOU determines this information in a different way, and through such determinations derived their estimates of costs to process each non-NEM application, but none provides the level of project-specific differentiation contemplated by the Ruling For Southern California Edison Company (“SCE”) the processing costs per non-NEM interconnection application are \$835 for non-export projects and \$1,247 for export projects. For San Diego Gas & Electric Company (“SDG&E”) the processing costs per non-NEM interconnection application “is approximately \$1,887 per application, with estimated costs ranging from approximately \$1,490 to \$6,357 per application.”<sup>7</sup> Finally, for Pacific Gas and Electric Company (“PG&E”) this exercise produced processing costs per non-NEM interconnection application of \$1,075 in 2024 and \$740 in 2025.<sup>8</sup> As discussed below these estimates are riddled with deficiencies and as result are not representative of anything. The estimates are akin to estimating the average value of all the cars at a dealership to be \$100,000 and no matter whether you drive home in a deluxe BMW SUV or a Kia sedan you pay the same price for the vehicle. Moreover, the estimates highlight inefficiencies in the process which should be rectified going forward, helping to reduce wasteful expenditures.

More fundamentally, the IOUs’ responses fail to satisfy the Ruling’s express direction that, where costs vary based on project characteristics such as generating technology or project size, the utilities separate their responses into appropriate cost buckets. None of the IOUs did so.

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<sup>7</sup> SDG&E Response, p. 6.

<sup>8</sup> PG&E Response, pp. 2-3.

Instead, they rely on broad averages that collapse vastly different project types and levels of complexity into a handful of undifferentiated cost estimates. That is precisely the type of “one size fits all” approach the Ruling sought to avoid and it cannot serve as a reasonable basis for establishing equitable application fees.

**A. Southern California Edison Company**

**1. Overview of SCE’s Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

While, as noted above, SCE does not maintain a system capable of tracking the project-level data necessary to determine the actual end-to-end labor hours and costs associated with the processing of non-NEM interconnection requests, it did attempt, unlike the other two IOUs, to incorporate a modicum of precision into its cost estimation process. First, it identified the three organizations within SCE that contribute to processing interconnection applications – Interconnection Processing, Grid Contracts, and Distribution Generation Interconnection. It then broke down the tasks that each of these groups perform at various stages of the process and determined an estimated time for each of the task(s), differentiating between export and non-export projects. SCE then added up the various times required of each of the organizations for each of export and non-export projects. Having the time allocations, SCE then determined the midpoint hourly range for the employee doing the work and multiplied it by the hours devoted to that work. Thus, there is a separate cost number for each of Interconnection Processing, Grid Contracts and Distribution Generation Interconnection associated with each project. When these three costs numbers are added up, SCE estimates the cost of processing non-export applications is \$695.66 (\$834.79 once the 21 percent overhead is added) and \$1,039.23 for export applications (\$1,247.07 once 21 percent overhead is added).

## **2. Critiques of SCE's Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

As will be made evident later in these comments, SCE's methodology for determining the costs of processing non-NEM applications far exceeds those of its counterparts. However, at bottom, it is just an estimate which applies equally across the board despite what could be significant variations in projects. For each non-NEM project, despite the technology, despite the size, SCE provides two costs estimates for processing an interconnection application one for export projects and one for non-export project..<sup>9</sup> SCE takes this minimalist approach despite acknowledging that there are other factors of which it is aware that increase the costs of processing an application. For example, SCE highlights the following elements as causing additional costs:

- Proposed configuration using Power Control System for limited or no export.
- Proposed non-certified equipment.
- Projects that fail one or more Initial Review screens or require a cost estimate report.
- Projects requiring Supplemental Review or Detailed Study.
- Projects requiring evaluation of transmission-system dependencies.
- Projects involving multiple review cycles due to application deficiencies or modifications.
- Projects that require one or multiple site visits..<sup>10</sup>

The Joint Parties are not contesting that these elements may result in additional cost incurrence. But that does not justify charging all applicants for activities that may only be applicable to a few. Indeed, SCE acknowledges that “[n]on-exporting projects bypass evaluation of Screens J,

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<sup>9</sup> SCE Response, Appendix and p. 17 (SCE does not currently provide estimated application-processing costs by project size, technology type, or customer class. For purposes of this response, SCE has provided labor cost estimates only for the two review categories for which it has developed estimates: exporting projects and non-exporting projects.)

<sup>10</sup> SCE Response, p. 17.

K, L, and M” and also shows, in table format, that certain screens only apply to projects above a specific size.<sup>11</sup> Despite this acknowledgement that a typical project under 30 kW would bypass the majority of screens, SCE provides only a single cost estimate for *all* export projects and a single cost estimate for *all* non-export projects. Given that small projects do not through a vast majority of the extensive screens in Rule 21, it is reasonable to believe that these projects would require less review time and cost less to process.

Finally, the Joint Parties note that SCE attests that based on “historical operational experience indicates that a *substantial percentage of applications require one or more deficiency notices* prior to being deemed valid.” As a result, SCE has built into the estimated review times “the expected effort associated with additional review cycles.”<sup>12</sup> Indeed it has built in over two hours of additional processing time for export projects. Again, the Joint parties are not contesting SCE’s claim that substantial number of applications are deficient. However, this indicates that the application submission process should be evaluated and improved, rather than perpetuating a flawed process and requiring customers to bear the resulting costs.

## **B. San Diego Gas & Electric Company**

### **1. Overview of SDG&E’s Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

SDG&E estimates that processing a typical non-NBT/NEM interconnection application requires approximately 13 hours of direct staff time per application. SDG&E states that this s estimate which represents the average level of effort across the following primary functions involved in processing a non-NEM interconnection application: (1) application review (one

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<sup>11</sup> SCE Responsa, p. 13.

<sup>12</sup> *Id.*, p. 3 (emphasis added).

hour), (2) engineering analysis (one hour), (3) records and contract administration (four hours), (4) field inspection (one hour), and (5) post-approval processing (five hours).

SDG&E then multiplies the estimated staff hours against “the fully loaded labor rates”<sup>13</sup> SDG&E does not specify what those labor rates are or how they differ between types of staff, but “estimates that the average cost to process a non-NBT/NEM interconnection application is approximately \$1,887 per application.”<sup>14</sup> Dividing \$1,887 by the estimated 13 staff hours equates to a labor rate of \$145/hr.

## **2. Critiques of SDG&E’s Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

Even if one accepted the basic calculation behind SDG&E’s interconnection application processing cost – hours spent x fully loaded cost of labor – the inputs to that calculation are overly broad, presenting distorted results.

First, while SDG&E takes the five primary functions involved in processing a non-NEM interconnection application and further delineates each into 3 to 5 subtasks, it does not specify the time spent on each subtask. More importantly it does not indicate whether each subtask is necessary for each non-NEM application (or even delineate between export and no-export).

Second, SDG&E’s submission indicates that it spends 11 of the 13 hours it takes to process a non-NEM application on administrative tasks.<sup>15</sup> Not only is this triple the time that SCE spends on administrative tasks,<sup>16</sup> but it stands in stark contrast to the one hour spent by

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<sup>13</sup> The fully loaded labor rates include direct labor costs as well as applicable overheads and support costs associated with providing the service,

<sup>14</sup> SDG&E Response, p. 6.

<sup>15</sup> SDG&E Response, pp. 3-4. (SDG&E claims that it spends one hour on “Administrative and Compliance,” five hours on “Records and Contract Administration” and five more hours on “Post-Agreement and Permission to Operate Activities”).

<sup>16</sup> SCE Response, p. 4.

SDG&E on “Technical Engineering Review and Analysis.” Moreover, the large amount of time devoted to administrative tasks does not comport with the significant automation of the application process which SDG&E purports to have undertaken..<sup>17</sup>

Third, there is no attempt by SDG&E to distinguish exporting versus non-exporting systems despite admitting that non-exporting and limited-exporting systems “are evaluated differently because the technical impacts to the grid are not the same.”<sup>18</sup> As illustrated by SCE, certain tasks are not necessary for the processing of applications for non-exporting systems, while others require a reduced amount of time, resulting in reduced costs.

Fourth, the labor rate used by SDG&E is a “black box.” As noted above, simple math would indicate that on average the labor rate is \$145/ hr. There is no way to test the validity of such a rate, as SDG&E did not provide differing labor rates for the differing employee types used in application processing. However, SDG&E does note that it “uses utilizes an estimated fully loaded engineering rate of approximately \$237,”<sup>19</sup> which is twice that of PG&E.<sup>20</sup> and SCE..<sup>21</sup>

Fifth, while SDG&E calculates a per application cost of \$1,187 it goes on to state, however, that estimated costs range “from approximately \$1,490 to \$6,357 per application depending on project complexity, the number of reviews required, and the level of utility resources involved.”<sup>22</sup> Where SDG&E came up with those numbers is a complete mystery as it did not specify the additional staff hours which would be required, and the purpose therefore

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<sup>17</sup> SDG&E Response, pp.10-12.

<sup>18</sup> *Id.*, p. 15.

<sup>19</sup> *Id.*, p. 20.

<sup>20</sup> PG&E Response, p. 9.

<sup>21</sup> SCE Response

<sup>22</sup> SDG&E Response, p.6.

with respect to the applications costing above \$1,887, nor does it indicate which processing tasks would be cut (and thus reduce costs) for the applications which would cost less.

Sixth, in response to the Ruling's question as to whether "there approximate capacity threshold(s) at which there is a significant increase in the complexity and time required to review the application,"<sup>23</sup> SDG&E is non-responsive stating that "[w]hile larger projects often require more extensive review, capacity alone is not a reliable predictor of review duration or study complexity."<sup>24</sup> While the Joint Parties do not disagree that there will always be outliers, charging the same application processing fee to a less than 30 kW installation as a 5MW installation, absent specific data to show they have comparable processing times, is not equitable.

Finally, the Joint Parties note that the deficiency level in SDG&E's application process is abnormally high. SDG&E states that of the 1012 non-NEM projects that reached PTO in 2024 and 2025, *ninety one percent* had a one or more deficiencies, with sixty four percent having two or more..<sup>25</sup> SDG&E estimates, given these deficiencies, "the processing team performs approximately three technical reviews per application on average, consisting of the initial review and subsequent reviews following applicant resubmittals."<sup>26</sup> Stated another way these deficiencies are unnecessarily driving up the cost of the application review process. When 91 percent of applications are deficient the question becomes whether the fault lies with the applicants or the process itself. The Commission should not base any fee for non-NEM applications that is based on a faulty process.

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<sup>23</sup> Ruling, p. 4.

<sup>24</sup> SDG&E Response, p. 14.

<sup>25</sup> *Id.*, p.13.

<sup>26</sup> *Id.*, p. 23.

## **C. Pacific Gas & Electric Company**

### **1. Overview of PG&E's Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

In estimating the costs for non-NEM application costs, PG&E's inputs are even more rudimentary than those used by SCE and SDG&E and it is clear that PG&E backed into its estimates in a convoluted manner. Specifically, PG&E takes two buckets of labor costs associated with processing interconnection applications - one categorized as "Engineering Costs" and one categorized as "EGI" (which is presumably electric generation interconnection") - and then with respect to each of those buckets divides the total costs to process all non-NEM applications by the number of applications to reach a cost of application for each of the "Engineering Costs" and "EGI". It then adds these two quotients to derive the total cost to process each non-NEM application. PG&E undertakes this exercise for both 2024 and 2025..<sup>27</sup> Using this exercise PG&E estimated a cost per non-NEM A of \$1075 for 2024 and \$740 for 2025..<sup>28</sup> While PG&E undertakes the exercise of coming up with a cost per hour associated with the two buckets of labor costs, by taking the cost for each of Engineering and EGI and dividing by the total hours spent for each..<sup>29</sup> it does not appear that this per hour labor cost directly factors into its estimate of processing costs per application.

### **2. Critiques of PG&E's Methodology for Determining Processing Cost per Non-NEM Interconnection Application**

The manner which PG&E estimated its costs per application is so opaque that it is impossible to determine if there is any veracity behind it.

First, PG&E presents two buckets of costs, with no attempt to define the various tasks

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<sup>27</sup> PG&E Response, p. 2.

<sup>28</sup> *Id.*, pp. 2-3.

<sup>29</sup> *Id.*, p. 3.

which comprise those costs, nor the amount of time which is associated with each task (or even group of tasks as SDG&E did). Taking an ill-defined set of costs and dividing the number of applications processed as a means of determining cost per application puts all applications on equal footing, which clearly they are not.

Second, PG&E determined labor costs per hour by taking the total cost spent and dividing it by the total number of employee hours expended and claiming the result of that calculation as their cost of labor per hour. No attempt was made to discern the cost of various types of labor which comprise the processing of a non-NEM interconnection application and accrediting each type with a value.

Third, like SDG&E, there is no attempt by PG&E to distinguish between the costs of processing applications for exporting systems versus non-exporting system. SCE has demonstrated that the latter should be less expensive.

Fourth, in responding to the Ruling's question on whether there are capacity threshold(s) at which there is a significant increase in the complexity and time required to review the application, PG&E responds in a fashion which underscores the need for more deliberate pricing for processing non-NEM interconnection applications. Specifically, PG&E states complexity is more readily equated with whether the proposed generating facility, in aggregate with existing and queued generation, causes the project to fail Initial Review screens..<sup>30</sup> PG&E further states that "projects under 30kW, i.e., Standard NEM projects, are less complex and do not require detailed studies." But it is not just standard NEM projects which fall into this category of "less complex." As PG&E attests, approximately 98% of non-NEM interconnection applications

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<sup>30</sup> *Id.*, p. 6.

passed initial technical screens without going to supplemental or detailed review. .<sup>31</sup>

### **III. THE IOUS SHOULD BE DIRECTED TO PROVIDE ADDITIONAL DATA**

If it is the Commission's intent to use the IOUs' current costs as the foundation for updating the fee for processing non-NEM interconnection applications, the IOUs' responses to the Ruling do not provide sufficiently sound data upon which to establish equitable fees. As illustrated above, their estimates are too rudimentary, they do not adequately differentiate based on project types, sizes, or complexity and they assume that review steps apply across the board when they do (or should) not. The Joint Parties do not contest that the IOUs currently lack the *automated* ability to time track project-level data necessary to determine the actual end-to-end labor hours and cost associated with the processing of non-NEM interconnection requests, as they have represented. That said, the IOUs do not lack the ability to *manually* determine the time it takes to process application for various size/ types of projects. To this end, the Joint Parties support the comments being submitted by the California Solar & Storage Association setting forth eight different non-NEM project types for which the IOUs should be required to separately discern the costs of processing an interconnection application..<sup>32</sup> For each of these project types, the IOUs should identify the individual tasks which comprise the application process, including a description of each task, which internal team is involved, the extent to which the task is automated, and a time estimate for the individual task. The Joint Parties recognize that the IOUs have represented that this information cannot be provided through an automated process. Rather the IOUs will have to manually review the processing of applications for each of the eight

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<sup>31</sup> *Id.*, p. 4.

<sup>32</sup> *Reply Comments of the California Solar & Storage Association on the Utilities Response to the Ruling Requesting Data on the Cost of Processing Non-NEM?NBT Interconnection Applications*, R. 25-08-004 (August 28, 2026), pp. 4-5.

project types and distill the tasks necessary and associated time to completion of each task. The IOUs' inability to track the data through an automated protocol is not basis for overcharging consumers for the costs of processing an application.

Moreover, as the IOUs will need to review their processes manually, the Commission should direct them to look at each step in the application process and assess the ability to use artificial intelligence and automation to improve its efficiency and to report such findings to the Commission. Indeed, SCE reports that it "uses limited automation in its application-review process,"<sup>33</sup> while PG&E reports that the only part of its process that is automated are the initial Rule 21 screens..<sup>34</sup> In comparison, SDG&E claims that "[t]he majority of application processing activities for both NEM/NBT and non-NBT/NEM interconnection requests are currently supported through automated functionality within DIIS,"<sup>35</sup> but yet has the highest claimed interconnection application costs. Clearly there is a need for a careful review of the IOUs' processes to see where automation or artificial intelligence can reduce costs and, in areas where automation is already being used, whether it is being used effectively. The result of the Commission ordered review can be submitted concurrently with the additional cost data discussed above.

Once the required data and associated process assessments are submitted to the Commission it can be utilized for two purposes. First, to more carefully delineate appropriate application fees for varying types of projects and, second to remedy inefficiencies in the process. Once remedied the estimated costs savings resulting from such in the new application fees that are established. .<sup>36</sup>

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<sup>33</sup> SCE Response, p. 9

<sup>34</sup> PG&E Response, p. 3.

<sup>35</sup> SDG&E Response, p.11.

<sup>36</sup> The Joint Parties recognize that the Commission may want to adopt new interconnection fees for non-NEM projects prior to the IOUs recognition of cost savings from the correction of inefficiencies in

Finally, while the above process is playing out the Commission, through ruling or decision, should temporarily set the interconnection application fee for residential non-NEM projects less than 30 kW equal to the interconnection fee currently in place for NEM systems. As noted by Tesla, from the perspective of the grid these projects are certainly no more complex or impactful, and in some cases, notably non-exporting systems are likely to have fewer impacts than NEM/NBT systems..<sup>37</sup> The IOUs have not cost justified charging these type of systems an \$800 interconnection application fee, in fact the information they provided proves the opposite.<sup>38</sup>The IOU should not be allowed to benefit from their delay in providing the necessary cost information to properly evaluate the fee.

Respectfully submitted this 28<sup>th</sup> day of August, 2026, at San Francisco, California.

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their processes. These forthcoming costs savings, however, should be reflected in any newly adopted interconnection fees but not by settings those fees at the highest level indicated by current costs.

<sup>37</sup> Tesla Opening Comments on Scoping Memo (April 30, 2026), p. 14; CALSSA Opening Comments on Scoping Memo (April 30, 2026), p. 40.

<sup>38</sup> For example, the IOUs' responses show that the overwhelming majority of non-NEM/NBT projects do not require Supplemental Review or Detailed Study: approximately 98 percent for PG&E, 98.4 percent for SCE, and 100 percent of SDG&E's approved applications for 2024–2025 passed Initial Review without requiring Supplemental Review or Detailed Study