



May 8, 2012

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 1st Street, N.E.
Washington, D.C. 20426

Re: California Utilities Reply Comments in Docket No. RM12-10-000 (May 4, 2012)

Madam Secretary:

The Solar Energy Industries Association ("SEIA") has reviewed the reply comments filed May 4, 2012, by Pacific Gas & Electric, San Diego Gas & Electric and the Southern California Edison Company (collectively, "California Utilities") in the above captioned proceeding. The reply comments state that SEIA's Answer in this proceeding "mischaracterizes" the Rule 21 interconnection settlement.¹

Rather than engage in a point-by-point rebuttal of the reply comments, SEIA repeats the following statement from its Answer regarding the contents of the SEIA proposal:

Any reference to the 100% of minimum daytime load supplemental screen in this answer should be read to include the California settlement penetration test as well as the power quality & voltage fluctuation, safety and reliability screens. The 100% daytime load screen combined with these additional screens is at the heart of the SEIA proposal, provided the process is well defined and transparent from the solar developer perspective. Moreover, as stated repeatedly in the Petition, SEIA is not proposing to eliminate the 15% screen.²

To further clarify the SEIA proposal, attached is a chart from the Rule 21 settlement.³ SEIA supports modifications to the federal interconnection process consistent with the framework in the chart. SEIA hopes this will facilitate a common understanding of the SEIA proposal.

¹ California Utilities Reply Comments at p. 2; and Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations, CPUC Docket R. 11-09-011 (submitted March 16, 2012) ("California settlement.")

² SEIA Answer at p.2, n.l. California Utilities cite this language in a footnote in their reply but do not otherwise discuss it

³ California settlement, Revised Rule 21 Tariff at 60 "Interconnection Technical Framework Overview."

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Sincerely

A handwritten signature in black ink, appearing to read "Daniel M. Adamson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Daniel M. Adamson
Vice President of Regulatory Affairs & Counsel

Attachment

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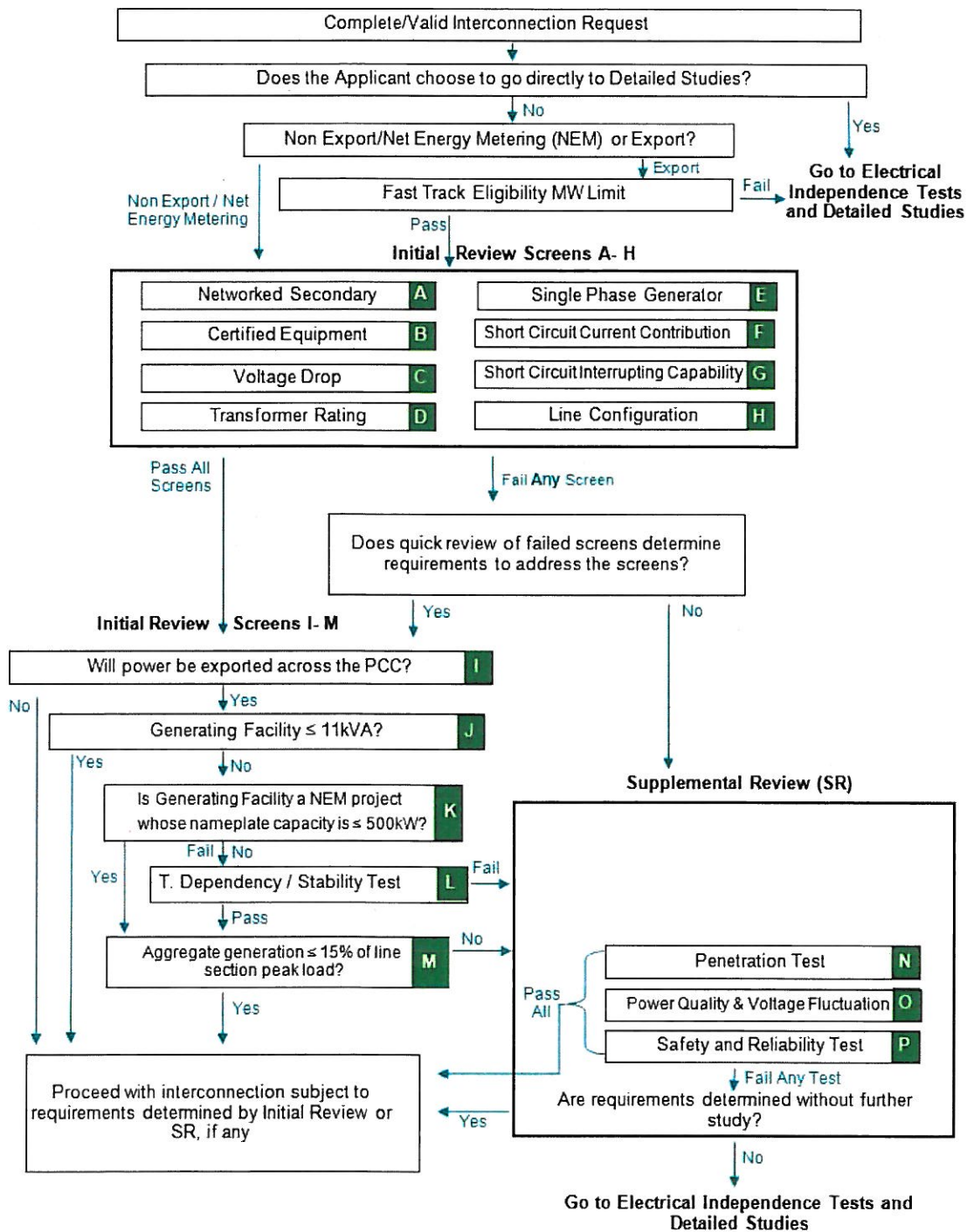
CERTIFICATE OF SERVICE

The undersigned hereby certifies that she has on or before the 8th day of May, 2012, served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

A handwritten signature in black ink, appearing to be 'H. Whitpan', written over a horizontal line.

Heather Whitpan, SEIA

Interconnection Technical Framework Overview



From--Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations, California Public Utilities Commission R. 11-09-011 (Mar. 16, 2012) Signatories include SCE, SDG&E, PG&E and SEIA]