# 10. CSI PBI Data Transfer Rules

## INSTRUCTIONS FOR QUALIFYING AS A PERFORMANCE DATA PROVIDER FOR THE CALIFORNIA SOLAR INITIATIVE PROGRAM

The purpose of this section is to outline the required process and qualifications to be approved as a Performance Data Provider (PDP) for the California Solar Initiative incentive program. This section also details the data reporting requirements (format, delivery method) and schedule for Performance Based Incentive data reports. The PDP requirement is mutually exclusive of the requirements identified in the CSI Handbook for the Performance Monitoring and Reporting Services. However, the PMRS provider may provide both PMRS and PDP services. All PDPs must meet the requirements established herein in addition to the requirements set forth in the CSI Program Handbook.

## BACKGROUND AND REQUIREMENTS

Utility customers participating in the California Solar Initiative (CSI) program are required to install performance meters to determine the gross energy generated by their generation equipment. For customers enrolled under the CSI Performance Based Incentive (PBI) program, data from these meters will be used to calculate their monthly incentive payment. This data may be read and communicated to the Program Administrator (PA)<sup>50</sup> by a third-party Performance Data Provider (PDP). Customers may also elect to contract this service through their local utility company. This document provides information and instructions for non-utility providers wishing to qualify to provide PDP services.

The following are the PDP's primary responsibilities:

- Manage meter reading/data retrieval schedule
- Read and retrieve performance meter data
- Post data on appropriate Program Administrator server on a consistent and reliable schedule, per individual Program Administrator requirements.
- Validate performance data prior to providing to the PA using the approved validation rules outlined in this document
- Calculate monthly production of solar generating system for incentive payment
- Format data using EDI 867 or other approved protocol
- Troubleshoot and resolve communications issues
- Store data in accordance with program requirements
- Make historical performance data available to Program Administrators as requested
- Provide technical support to Program Administrators as well as customer support
- Communicate meter/device changes to the Program Administrator
- Provide disaster recovery and data backup services as requested by respective Program Administrator

<sup>50</sup> PG&E and SCE are the Program Administrators for the California Solar Initiative program for customers in their respective service territories. The California Center for Sustainable Energy is the Program Administrator for the SDG&E service territory.

- Manage data on PDP server
- Ensure confidentiality of customer information and performance data
- Possess technical expertise and capability
- Comply with all State and Federal laws

## PDP TASK REQUIREMENTS

## Data Format

Data must conform to the specific program requirements (for CSI requirements, see Section 5 of the CSI Handbook). The PBI Data Report must include 15-minute (as defined in Section 5.2.3 *Time Granularity of Acquired Data,* CSI Program Handbook) and the monthly cumulative production meter read. All PBI Data Reports must be formatted using the ANSI X.12 Electronic Data Interchange 867 protocol (EDI 867) unless otherwise specified. Sample EDI 867 Implementation Guides and Tutorials are available from each of the Program Administrators. The EDI 867 requirement will go into effect 6 months from the day the PDP Protocols are ratified. After this effective date, all PDP Providers must, at minimum, be in the process of EDI 867 data transfer tests with one or more Program Administrators.

## Data Reporting, Security and Confidentiality

The PDP is responsible to ensure timely, consistent and accurate reporting of performance data. Data must be located in a secure facility, on a secure server and have firewall and equivalent protection. The PDP must protect the confidentiality of the customer information and performance data in accordance with all program guidelines (for CSI requirements, see Section 5 of the CSI Handbook). The data must be transferred to each PA using a secure FTP server and each PDP must contact the appropriate PA to obtain the secure FTP address. The PDP must follow all applicable state and federal privacy and data security laws. **The Program Administrator is not responsible for, and will not pay any customer incentives based on missing, estimated or invalid performance data.** 

### Data Validation

The PDP must validate all data prior to posting it to the PAs secure FTP server. The following data validation rules shall apply:

- Time Check of Meter Reading Device/System (all)
- Meter Identification Check (all)
- Time Check of Meter (all)
- Pulse Overflow Check (if applicable to metering system)
- Test Mode Check (if applicable to metering system)
- Sum Check

Descriptions of these validation rules are included in Attachment A.

### Payment Validation, Data Audits, and Measurement and Evaluation Program

The Program Administrator may, at their discretion, perform validations on incentive payments prior to issuing payments to customers participating in this program. The validations will compare actual monthly incentive payments with expected payments based on design

specifications and expected performance data submitted with the Host Customers' approved incentive reservation documentation. If payments fall outside expected ranges for the month, the incentive payment will be withheld until the Program Administrator determines to its satisfaction the reason for the discrepancy.

The PDP will work with the Host Customer to resolve any discrepancies identified by the Program Administrator, which may include testing and/or recalibrating the meter/devices if deemed necessary. The Program Administrators are not responsible for the costs associated with investigating and resolving any such discrepancies (i.e., testing, meter replacement hardware, installation labor). However, if the Program Administrator requests an investigation that finds that the metering system is accurate, the Program Administrator will pay all reasonable and necessary costs for the investigation.

The Program Administrator will also perform random audits of PDP data to ensure accuracy and compliance with the requirements outlined in this document, or as part of the CSI Measurement and Evaluation Program in accordance with the CSI Handbook. Any PDP found to be in violation of any of these requirements will be subject to the penalties outlined later in this document. The Program Administrator, via the servicing local utility or its designated contractor may, at its discretion, inspect and test the performance meter or install separate metering in order to check meter accuracy, verify system performance, or confirm the veracity of monitoring and reporting services.

Any additional metering installed by or at the request of the Program Administrator will be paid for by the Program Administrator. However, in the event metering is installed during the course of an audit or investigation initiated by the Program Administrator where cheating or tampering is suspected and confirmed, the System Owner will be charged for these costs.

### Data Retention

Raw and PDP validated interval and cumulative monthly data must be retained in accordance with appropriate program requirements (see Section 5 of the CSI Handbook for CSI program requirements). The PDP must be prepared to post historical interval data at the Program Administrator's request. The Program Administrator audit will include raw interval data, which is to be maintained by the PDP for comparison with validated interval data transmitted to the Program Administrator. The PDP is also responsible for providing backup and disaster recovery services for 100% of the data (in accordance with the CSI data retention policy outlined in Section 5 of the CSI Program Handbook)

### **Technical and Customer Support**

The PDP must provide a technical support number to the Program Administrator for use during normal business hours (8am to 5pm Pacific time, Monday through Friday, except holidays) to help resolve any data availability, format or corruption issues, communication problems, server access problems, or other technical issues. Within those normal business hours, the PDP must respond to Program Administrator requests within two business days with a status report and plan for correcting the issues. The PDP must also provide a customer support number to respond to customer inquiries within two business days from the initial customer contact. Program Administrators will have the discretion to set deadlines for the resolution of data transfer problems/issues.

## **PDP Performance Exemptions**

The PDP is responsible for meeting the above noted program requirements and for consistently posting performance data in accordance with the Program Administrator's scheduling and data posting requirements. At its discretion, the Program Administrator may grant reasonable allowances for occasional issues or technical problems, as well as for large catastrophic events such as earthquakes.

In the event of such catastrophic event resulting in an energy production interruption; OR in the event of metering or communications equipment failure where the production data is irretrievable by the PDP at no fault of the customer AND it can be determined that the customer's generating equipment was still operating and interconnected with the utility grid, the Program Administrator may extend the PBI incentive payment period beyond the established timeframes otherwise specified by the incentive program Handbook. The PBI incentive payment extension period will be equivalent to the same period the system energy production data is unavailable. In situations in which a communications issue results in missing data, but the data is later retrieved, the Program Administrator will accept the retrieved data and process payment for the recovered data with the next payment period and no extensions of the PBI incentive payment period will be necessary. To submit a Data Report relative to missing data, the PDP will resubmit the respective Data Report, thereby replacing the previous incomplete report with a complete month of data.

### PDP Non-Performance

The Program Administrator will not issue incentive payments to customers based on estimated data from the PDP, nor will the Program Administrator estimate incentive payments under any circumstances. It is the PDP's responsibility to ensure timely (+ 5 days after the end of the specified reporting period) and accurate posting of validated performance data so customer incentive payments can be made.

The following conditions may result in penalties, suspension of activity, or revocation of PDP approval from the Program Administrator:

- Data not posted by specified date (10% of accounts serviced by PDP over a onemonth period are late).
- No data received for incentive period (per customer: no data posted 2 times consecutively OR 3 times in 6 months; and/or per PDP: no data posted for 10% of accounts serviced by PDP). Submittal of corrected data or previously missing monthly data must be received in cycle sequence.
- Data not validated in accordance with program requirements over the course of the CSI Program. (1 time)
- Estimated data posted instead of actual data. (1 time)
- Meter change information not reported within 30 days of the meter change. (3 times within 6 months)
- If an audit or investigation shows a discrepancy of -/+ 5% between the PDP reported data and Program Administrator check meter production data for one data report period. This discrepancy will trigger an audit schedule set by the Program Administrator for the PDP.

The PDP will be given reasonable opportunity to correct problems identified by the Program Administrator. The Program Administrator will work with the PDP to correct any such problems and avoid unnecessary delays in issuing incentive payments to customers, to the extent feasible. However, if the PDP fails to resolve any issues to the Program Administrator's satisfaction within 60 days, which result in delays in incentive payments to customers, the following penalties may apply:

- If the problem is with a single or less than 20% of customer accounts served by the PDP, the Program Administrator will suspend PDP activity with just those affected customers. The affected customers will be notified that the PDP has been unable to resolve the specified issue within an acceptable timeframe, and they will be given a 30-day grace period to select and engage with another PDP. The original PDP will be required to transfer all historical data to the newly selected PDP. No incentive payments will be made until the customer provides a contract or similar document proving they are engaged with another PDP, but the customer's incentive payment period will be extended beyond the established period allowed under the applicable program rules to compensate for this interruption in payments. If the customer fails to engage with and provide proof that they have contracted with a new PDP within the allowable grace period, the time between the grace period expiration date and the date the Program Administrator receive such proof will be deducted from the established payment period.
- If the problem is of a more serious nature as determined by the Program Administrator and continues over 60 days, or it affects more than 20% of customers served by the PDP, the PDP's approval will be revoked and all customers will be notified that they must select another PDP. As above, no incentive payments will be made until the customer selects another PDP, but the customers' incentive payment period will be extended beyond the established payment period. The PDP will be eligible to reapply after six months upon demonstrating that they have successfully resolved all problems to the Program Administrator's satisfaction.
- If an audit or investigation shows a discrepancy between the PDP reported data and data obtained by the Program Administrator for a specific customer that is greater than +/-5% and within the last three months of the PBI payment cycle, the PDP will be responsible for reimbursing the customer or Program Administrator for any such difference if it is determined that the difference is due to PDP error. The PDP will also be put on an audit schedule by the Program Administrator. If a third audit uncovers any discrepancy due to PDP error, the PDP's approval will be revoked and the customer given an opportunity to select another PDP as described above. Audits may be conducted as stated in the CSI Handbook.

Unless the PDP's actions results in revocation, upon receipt of a notice from the PA with respect to the PDP's failure to provide the performance, the PDP must, as soon as reasonably practicable: (1) perform a root-cause analysis to identify the cause of such a failure; (2) provide the PA with a report detailing the cause of, and procedure for correcting such failure within 3 days of completion of such root-cause analysis; (3) implement such procedure after obtaining the respective PA approval of such procedure.

## Criteria for a PDP Appeals Process

Should the PDP disagree with a PA decision regarding a penalty, the PDP has the right to appeal to the CSI Working Group for further consideration.

#### <u>APPLICATION PROCESS</u> Application & Documentation

Prior to applying with each program administrator, applicants must first be listed on the Go Solar California Website as an eligible Performance Monitoring and Reporting Service Provider. Please visit the website for the PMRS Provider Certification Form at: http://gosolarcalifornia.org/equipment/monitors+rsp.html

The PDP Applicant completes the attached "Application for PDP Services" and provides all documentation in the attached checklist. Note that the PDP Applicant must submit separate applications to and successfully complete the data transfer test described later in this document for each utility or Program Administrator.

In PG&E's service territory, the PDP Applicant forwards the completed application and required documentation to the following:

Mail to:	Program Manager, California Solar Initiative Pacific Gas & Electric Co. P.O. Box 770000 San Francisco, CA 94177-0001
For questions, contact:	Program Manager, California Solar Initiative Phone: (415) 973-3480 Fax: (415) 973-2510 Email: <u>SolarPBI@pge.com</u> Web: www.pge.com/csi

In SCE's service territory, the PDP Applicant forwards the completed application and required documentation to the following:

Mail to:	Program Manager, California Solar Initiative Southern California Edison 6042A Irwindale Ave Irwindale, CA 91702
For questions, contact:	Program Manager, California Solar Initiative Phone: (866)-584-7436 Fax: (626) 633-3402 Email: <u>pbi@sce.com</u> Web: <u>www.sce.com/rebatesandsavings/CaliforniaSolarInitiative/</u>

In San Diego Gas & Electric's service territory, the PDP Applicant forwards the completed application and required documentation to the following:

Mail to:	California Center for Sustainable Energy Attn: CSI Program Manager 8690 Balboa Avenue Suite 100 San Diego, CA 92123
For questions, contact:	California Solar Initiative Program Manager Phone: (858) 244-1177 Fax: (858) 244-1178 Email: <u>csi@energycenter.org</u> Web: <u>www.energycenter.org</u>

The Program Administrator will review the submitted documentation, determine if the PDP Applicant meets the program requirements and notify the PDP Applicant via email. The Program Administrator will review the application and respond to the PDP Applicant within 10 business days.

### Data Transfer Test

Once the Program Administrator has reviewed and accepted the prospective PDP's application, they will contact the PDP Applicant to schedule a data transfer test.

Program Administrators will provide PDP Applicants with test data sets that the prospective PDP must download, validate, and format before submitting the Data Report back to the Program Administrator via secure FTP. The PDP Applicant is also responsible for downloading the Program Administrator's EDI 867 Implementation Guide and Tutorials from its website. The PDP must contact their respective Program Administrator for specific instructions regarding this testing process.

The Program Administrator will check the test file to ensure it complies with the guidelines and notify the PDP Applicant within 5 business days. Once the PDP is notified it has passed the test, the PDP is considered qualified. If the PDP Applicant fails the test, they will be given 2 weeks to resolve any technical or data format issues. If a PDP Applicant fails their Data Transfer Test

with any individual CSI PA more than 3 times, they will not be eligible to add any additional customers in that PAs service territory until such PDP Applicant passes the Data Transfer Test.

### PDP Approval Initial Audit Period

Upon PA approval of the required PDP application documentation, and successful completion of the PDP data test procedures, the PDP will be qualified to provide PBI data to the Program Administrator for incentive payment. However, the PA's will audit the raw production data from each PDP's first data report for their first three customers for compliance with these PDP requirements. The PA will notify the PDP of noncompliance and will work to assist the PDP with resolving the issues.