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Description:	The California Energy Commission (CEC) is seeking public feedback to inform program design for the CEC's portion of California's Solar for All award from the US EPA. CEC staff has developed this Solicitation Concept Proposal which describes proposed concepts to solicit feedback for developing a formal solicitation. Program staff seeks comments by August 11, 2025. Please see the program webpage for more information at https://www.energy.ca.gov/programs-and-topics/programs/solar-for-all-program .
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GRANT FUNDING OPPORTUNITY

CEC Solar For All (POU Territories)

SOLICITATION CONCEPT PROPOSAL



**State of California
California Energy Commission**

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I. Introduction

This is a concept proposal only; no applications are requested at this time.

The solicitation concepts proposed below are not final and are subject to stakeholder feedback and revision.

A. PURPOSE OF SOLICITATION CONCEPT PROPOSAL

This document is intended to describe proposed concepts to solicit feedback for developing a formal solicitation document for the California Energy Commission (CEC) Solar for All Program, also referred to as the Grant Funding Opportunity (GFO) application manual, expected to be released later this calendar year.

The intent of the anticipated CEC Solar for All Program solicitation is to accelerate the deployment of solar, or solar with storage, and reduce electric bill pressures on low-income and disadvantaged community (LIDAC) customers, including tribes, in California's publicly owned utility (POU) territories.

This program was authorized under the federal Inflation Reduction Act of 2022 117th (Pub. L. No. 117-169, 136, [Stat. 1818](#)) and is administered by the United States Environmental Protection Agency (US EPA). The State of California received just under \$250 million and comprises a coalition of state agencies including the California Public Utilities Commission (CPUC), the California Employment Development Department (EDD), and the CEC. The CPUC will implement Solar for All programs serving LIDAC residents in the investor-owned utility (IOU) territories, and the CEC's Solar for All Program will implement projects in POU territories. EDD will offer workforce development and labor training programs.

This CEC Solar for All (POU territories) solicitation will provide \$25 million in awards to support investments in eligible technologies, including residential rooftop (for single- or multi-family), community solar, and associated storage systems, serving LIDACs in POU territories that achieve at least 20% electricity bill savings for program participants. This solicitation concept proposal is designed to incorporate and implement US EPA requirements, with additional CEC requirements included as appropriate (the requirements are detailed in Section II. Eligibility and Requirements).

B. KEY WORDS/TERMS

Word/Term	Definition
Applicant	An entity that submits an application in response to this solicitation.
Application	An applicant's written response to this solicitation.
Authorized Representative	The person representing the applicant who has authority to enter into an agreement with the CEC if the application is selected for a grant award.
BABA	<i>Build America, Buy America</i> , Public Law 117-58, requires the US EPA to ensure that for any activity related to the construction, alteration, maintenance, or repair of infrastructure, "none of the funds

Word/Term	Definition
	made available for a Federal Financial Assistance program for infrastructure, including each deficient program, may be obligated for a project unless all of the iron, steel, manufactured products, and construction materials used in the project are produced in the United States.” (P.L. 117-58, Secs 70911 – 70917). (See Appendix A for further guidance.)
California Native American Tribe	A Native American Tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004 (Pub. Resources Code, § 21073).
CAM	<i>Commission Agreement Manager</i> , the person designated by the CEC to oversee the implementation of an agreement with a grant recipient receiving grants from this solicitation and to serve as the main point of contact for the recipient.
CAO	<i>Commission Agreement Officer</i> , the person designated by the CEC to oversee the internal administrative processes and serves as the main point of contact for applicants submitting applications in response to this solicitation.
CBO	<i>Community Based Organization</i> , a nonprofit organization of demonstrated effectiveness that has deployed solar + storage projects and/or conducted outreach efforts for disadvantaged or low-income community or similar community.
CEC	<i>California Energy Commission</i> .
CEQA	<i>California Environmental Quality Act</i> , California Public Resources Code Section 21000 et seq.
DBRA	<i>Davis-Bacon and Related Acts</i> , is a collection of labor standards provisions administered by the Department of Labor, that are applicable to grants involving construction. (See Appendix A for further guidance.)
Days	<i>Days</i> refers to calendar days.
Disadvantaged Community	Communities designated pursuant to Health and Safety Code section 39711 as representing the top 25% scoring census tracts from CalEnviroScreen along with other areas with high amounts of pollution and low populations as identified by the California Environmental Protection Agency. (https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40)
Eligible Zero-Emissions Technology	There are four eligible zero-emissions technology categories: 1) residential rooftop solar; 2) residential-serving community solar; 3) associated storage; 4) enabling upgrades.
Federally Recognized Tribal Entity	Review Section II.C.1 for US EPA definition

Word/Term	Definition
GHG	<i>Greenhouse Gas</i> means carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride, as defined in Section 134(c)(2) of the Federal Clean Air Act.
LIDAC	<i>Low Income and Disadvantaged Community</i> . Review Section II.C.1 for the complete US EPA LIDAC definition.
Major Subrecipient	A Subrecipient that is budgeted to receive \$100,000 or more of CEC funds, not including any equipment or match funds that may be provided by the Subrecipient.
NOPA	<i>Notice of Proposed Award</i> , a public notice by CEC staff that identifies proposed grant recipients selected to receive grant awards from this solicitation.
Project Manager	The person designated by the applicant to oversee the project and to serve as the main point of contact for the CEC.
Project Partner	A person or entity that contributes financially or otherwise to the project (e.g., match funding, provision of a test, demonstration or deployment site), and does not receive CEC funds.
POU	<i>Publicly Owned Utility</i> , means a local publicly owned electric utility as defined by California Public Utilities Code section 224.3.
Recipient	A person or entity receiving a grant award under this solicitation. “Recipient” may be used interchangeably with “grant recipient”.
Solicitation	This entire document, including all attachments, exhibits, addenda, written notices, and questions and answers (“solicitation” may be used interchangeably with “Grant Funding Opportunity” or “GFO”).
Subrecipient	A person or entity that receives grant funds directly from a grant Recipient and is entrusted to make decisions about how to conduct some of the grant’s activities. A Subrecipient’s role involves discretion over grant activities and is not merely just selling goods or services.
Sub-Subrecipient	Has the same meaning as a Subrecipient except that it receives grant funds from a Subrecipient or any lower tier level of a Sub-Subrecipient.
State	State of California.
US EPA	<i>United States Environmental Protection Agency</i> .
Vendor	A person or entity that sells goods or services to the grant Recipient, Subrecipient, or any lower-tiered level of Sub-Subrecipient, in exchange for some portion of the grant funds and does not make decisions about how to perform or implement the project’s activities. The Vendor’s role is ministerial and does not involve discretion over grant activities.

C. FUNDING

1. Amount Available and Minimum / Maximum Funding Amounts

There is up to \$25,000,000 of funding available for grants awarded under this solicitation. The minimum and maximum funding amounts for awarded grants are listed below.

Minimum CEC award	Maximum CEC award
\$3,000,000	\$15,000,000

2. Match Funding

“Match funding” or “match share” means cash or in-kind (non-cash) contributions provided by the Applicant/Recipient, subrecipients, or other parties that will be used in performance of the proposed project. Match funding is **not** required for this solicitation. However, applications that include match funding will receive additional points during the scoring phase (see Section III.B. Application Scoring) based on the “total match share percentage”.

Total match share percentage is calculated by dividing the total match share contributions by the total CEC funds requested:

$$\frac{\text{Total Contributions Provided by Applicant}}{\text{CEC Funds Requested}} \times 100 = \text{Total Match Share percentage}$$

All applicants providing match funds must submit commitment letters that:

- 1) identify the source(s) of the funds and total dollar value of each funding source;
- 2) provide an unqualified (i.e., without reservation or limitation) commitment that guarantees the availability of the funds for the project; and
- 3) provide a strategy for replacing the funds if they are significantly reduced or lost.

Commitment letters must be submitted with the application to be considered.

3. Change in Funding Amount

Along with any other rights and remedies available to it, the CEC reserves the right to:

- Increase or decrease the available funding and the minimum / maximum grant award amounts described in this solicitation.
- Allocate any additional or unawarded funds to passing applications, in rank order.
- Reduce proposed grant awards to an appropriate amount if the budgeted funds do not provide full funding for agreements. In this event, the proposed grant recipient and Commission Agreement Manager (CAM) will attempt to reach agreement on a reduced Scope of Work commensurate with available funding.

4. Period of Performance

The US EPA requires a deadline for spending (liquidating, not encumbering) funds by April 30, 2029. The CEC may implement payment invoice deadlines ahead of this date to account for the necessary processing time to ensure funds are secured prior to US EPA deadlines. At the end

of the period of performance, all remaining unspent funds will be returned to the federal government.¹

Applications must describe how the project will ensure funds will be spent by the end of the period of performance, April 30, 2029, including a description of how the project will minimize and mitigate risks of project failure. Applications should include a detailed timeline and narrative description for ensuring grant funds will be spent by the deadline and must provide supporting documentation for key milestones including, but not limited to, legally binding site control, CEQA/permits obtained or verification of no permit required, project performance deposits or commitments to pay necessary interconnection costs and signed interconnection agreements.

D. KEY ACTIVITIES SCHEDULE

Key activities and anticipated dates for this solicitation and for grant agreements resulting from this solicitation are presented below.

ACTIVITY	DATE
Solicitation Concept Proposal Release	July 11, 2025
Public Workshop	Date to be Announced
Written Comments or Requests for Tribal Consultation on Solicitation Concept Proposal due; see options below: 1. Written comments can be submitted to the docket; 2. The CEC always welcomes tribal consultation but to best incorporate feedback, a California Native American Tribe should request a formal consultation by August 11, 2025, by contacting tribalaffairs@energy.ca.gov .	August 11, 2025
Final Solicitation Release	Q4 2025
Deadline to Submit Applications	~90 days after solicitation release
Anticipated Notice of Proposed Award (NOPA)	Q2 2026
Anticipated Grant Execution	Q2 or Q3 2026
Project Completion	Grant Execution to April 2029
US EPA Deadline to Spend All Grant Funding	April 2029

¹ U.S. EPA, Frequent Questions about Solar for All: Draw Down
<https://www.epa.gov/greenhouse-gas-reduction-fund/frequent-questions-about-solar-all#period>

II. Eligibility and Requirements

A. ELIGIBLE APPLICANTS

Eligible Applicants for this solicitation are any public or private entity including, but not limited to, non-profits and tribal entities, that can develop and deploy residential-serving Eligible Technologies (see Section II.B.1) serving LIDAC program beneficiaries (see Section II.C.1).

A coalition of the above entities submitting a joint application is eligible to apply.

An applicant may submit more than one application, provided each application does not overlap with another application in terms of project locations and project beneficiaries.

Applicants must register with the federal System for Award Management (SAM) to apply for this solicitation.

- **Note:** Applicants must ensure that this information is updated before submitting an application. The process of registration and/or renewal can take several weeks to complete and requires privileged information, including financial and banking information, which may take time to obtain. It is the applicant's responsibility to have all information up to date and accessible through the SAM prior to submitting the application. SAM registration must be reviewed and updated every 12 months to keep accounts current, accurate, and complete in the SAM database. To remain eligible for funding, applicants must maintain an active registration in the SAM database. Visit the [SAM website](#) for more information about registration requirements.

B. ELIGIBLE PROJECTS

1. Eligible Technologies

CEC funding for projects proposed in applications is limited to the four Eligible Technologies listed below, as defined by US EPA. Projects can include a combination of technologies but must at least include a) or b).

- a) **Residential Rooftop Solar:** Behind-the-meter solar photovoltaic (PV) power-producing facilities, including rooftop, pole-mounted, and ground-mounted PV systems, that deliver all the power generated from the facilities to residential customers in existing and new single-family homes, manufactured homes, or multifamily buildings. Residential rooftop solar includes behind-the-meter solar facilities serving multifamily buildings classified as commercial buildings so long as the solar facility benefits residential customers either directly or indirectly such as through tenant benefit agreements. Residential rooftop solar includes properties that are both rented and owned.
- b) **Residential-Serving Community Solar:** A solar PV power-producing facility from a power-producing facility, with up to 5 MWac nameplate capacity, that delivers at least 50% of the power generated from the system—by delivering at least 50% of the benefits (e.g., financial savings, renewable energy credits) derived from the power

generated by the community solar system—to residential customers within the same utility territory as the facility.²

- c) **Associated Storage:** Infrastructure to store solar-generated power for the purposes of maximizing residential rooftop and residential-serving community solar deployment that is deployed in conjunction with an eligible residential rooftop solar or residential-serving community solar project. Stand-alone energy storage infrastructure is not an eligible zero-emissions technology.
- d) **Enabling Upgrades:** Investments in energy and building infrastructure that are necessary to deploy or maximize the benefits of a residential rooftop and residential-serving community solar project. Enabling upgrades must satisfy all of the following criteria to be an eligible zero-emissions technology: (1) an investment in energy or building infrastructure and (2) necessary to deploy or maximize the benefits (i.e., financial savings or resiliency benefits) of a residential rooftop and residential-serving community solar project as defined above.

The above four Eligible Technologies are subject to additional CEC requirements and clarifications listed below. Additional CEC Terms and Conditions will be released with this solicitation (see hyperlink in Appendix C for a draft version):

- Applications proposing projects for new construction must describe how the proposed project will exceed the residential energy efficiency requirements of the 2022 California Building Energy Efficiency Standards, as set forth in Title 24, Part 6, of the California Code of Regulations.
 - Exceptions will be made if the project will serve fire-affected areas of Los Angeles and Ventura Counties covered by [Executive Order N-4-25](#) that suspends the California Environmental Quality Act and California Coastal Act.
- Applications proposing energy storage must demonstrate the following in order to score the preference points in Section III.B.1 Scoring Criteria:
 - Minimum storage power capacity rating equal to 20% of the nameplate DC power rating of the associated PV array.
 - Minimum storage energy capacity rating equal to one hour of energy production at 100% of the nameplate DC power rating of the associated PV array.
- Examples of enabling upgrades include electrical panel upgrades. Applicants may propose other enabling upgrades for CEC review and approval.

2. Eligible Project Costs

CEC grant funding must be used to provide financial assistance (defined below) and/or technical assistance (defined below) to enable LIDACs to receive benefits from deployment of Eligible Technologies. Please see Appendix C for the US EPA's Solar for

² US EPA Frequent Questions: Eligible Zero-Emissions Technology: <https://www.epa.gov/greenhouse-gas-reduction-fund/frequent-questions-about-solar-all#zero>

All Terms and Conditions (12/3/2024) for definitions. For the purposes of CEC's Solar for All Program solicitation, financial assistance and technical assistance means:

- **Financial Assistance** means grant funds deployed for project-related costs in the following CEC budget categories:
 - a) Direct Labor
 - b) Fringe Benefits
 - c) Travel
 - d) Equipment
 - e) Materials and Miscellaneous (Supplies)
 - f) Indirect Costs
- **Technical Assistance** means services and tools provided by grant recipients to enable Low-Income and Disadvantaged Communities to overcome non-financial barriers to rooftop residential solar or residential-serving community solar deployment or build the capacity of communities and businesses to deploy solar. Examples include:
 - a) Workforce training
 - b) Customer outreach and education
 - c) Siting, CEQA/permitting, and interconnection support
 - d) Coordination with utilities for the purposes of project deployment
 - e) Distributed solar deployment training for developers
 - f) Other services and tools that enable Low-Income and Disadvantaged Communities to deploy or benefit from rooftop residential solar and residential-serving community solar

3. Ineligible Project Costs

CEC grant funding cannot be used for the following activities:

- a) Activities that support deployment of projects that do not meet the above Eligible Technologies (for example, standalone energy storage and non-residential serving solar PV are ineligible).
- b) Costs of acquiring "intangible property," as defined in 2 CFR 200.1³; and
- c) Activities that support deployment of projects outside California POU territories.

Applications must demonstrate that 100% of CEC funds will go towards the portion of the project serving eligible LIDACs, as defined in Section II.C.1. CEC will not fund any portion of a project that does not serve LIDACs.

Applications proposing community solar may not request CEC funds for a solar energy purchasing program or a similar program that charges a premium over standard rates.

³ Code of Federal Regulations. § 200.1 Definitions. <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-A/subject-group-ECFR2a6a0087862fd2c/section-200.1>

C. PROJECT REQUIREMENTS

1. Low-Income and Disadvantaged Communities (LIDAC)

Applicants must demonstrate how the proposed project will serve at least one of the four LIDAC beneficiaries categories defined below:

- a) CalEnviroScreen: Located in a census tract within an identified disadvantaged community (DAC) according to the latest version of CalEnviroScreen, meaning those census tracts scoring in the highest 25% among the designated factors and land within the boundaries of Federally Recognized Tribes.
- b) Geographically Dispersed Low-Income Households: Low-income individuals and households living in Metropolitan Areas with incomes not more than 80% Area Medium Income (AMI) or 200% Federal Poverty Level (FPL), (whichever is higher), and low-income individuals and households living in Non-Metropolitan Areas with incomes not more than 80% AMI, 200% FPL, or 80% Statewide Non-Metropolitan Area AMI (whichever is highest). FPL is defined using the latest publicly available figures from the U.S. Department of Health and Human Services. AMI is defined using the latest publicly available figures from the U.S. Department of Housing and Urban Development (HUD). Metropolitan Area and Non-Metropolitan Area are defined using the latest publicly available figures for county-level designations from the Office of Management and Budget. Statewide Non-Metropolitan Area AMI is defined using the latest publicly available figures from the U.S. Department of the Treasury's Community Development Financial Institutions (CDFI) Fund, with an adjustment for household size using HUD's Family Size Adjustment factor.
- c) Properties Providing Affordable Housing: Properties providing affordable housing that fall within either of the following two categories: (a) multifamily housing with rents not exceeding 30% of 80% AMI for at least half of residential units and with an active affordability covenant from one of the following housing assistance programs: (1) Low-Income Housing Tax Credit; (2) a housing assistance program administered by HUD, including Public Housing, Section 8 Project-Based Rental Assistance, Section 202 Housing for the Elderly, Section 811 Housing for Disabled, Housing Trust Fund, Home Investment Partnership Program Affordable Rental and Homeowner Units, Permanent Supportive Housing, and other programs focused on ending homelessness that are funded under HUD's Continuum of Care Program; (3) a housing assistance program administered by USDA under Title V of the Housing Act of 1949, including under Sections 514 and 515; (4) a housing assistance program administered by a tribally designated housing entity, as defined in Section 4(22) of the Native American Housing Assistance and Self-Determination Act of 1996 (25 USC § 4103(22)); or (5) a housing assistance program administered by the Department of Hawaiian Homelands as defined in Title VIII of the Native American Housing Assistance and Self-Determination Act of 1996 (24 CFR 1006.10) or (b) naturally-occurring (unsubsidized) affordable housing with rents not exceeding 30% of 80% AMI for at least half of residential units.
- d) Federally Recognized Tribal Entities: All Federally Recognized Tribal Entities, which are considered disadvantaged regardless of whether a Federally Recognized Tribe has land, consistent with M-23-09 (memorandum dated as of January 27, 2023) and the Climate & Economic Justice Screening Tool

(CEJST). A “Federally Recognized Tribal Entity” means (i) any individual member of a Federally Recognized Tribe; (ii) any for-profit business that has at least 51 percent of its equity ownership (or the equivalent in limited liability companies) by members of Federally Recognized Tribes; (iii) any non-profit entity with at least 51 percent of its Board of Directors (i.e., Governing Board) comprised of members of Federally Recognized Tribes; or (iv) any Federally Recognized Tribal government entity. Under this definition, any Federally Recognized Tribal Entity is included within the definition of Low-Income and Disadvantaged Communities, regardless of where that entity is located (i.e., the entity may be located in areas outside of the CEJST land area dataset, including but not limited to tribal service areas or counties).

Note: A California Native American Tribe that is not federally recognized may qualify as a LIDAC by demonstrating compliance with criteria a, b, or c listed above.

2. Household Utility Bill Savings

Applicants must demonstrate how the proposed project will deliver a minimum 20% savings to households that are served by the project.

Review Appendix B and the US EPA Frequent Questions, [“Meaningful Benefits”](#) for further guidance from US EPA. US EPA guidance is subject to change.

3. Project Support Letters

Applicants must include Support Letters to demonstrate how the following CEC compliance requirements will be met:

a) POU Letter of Support

Applications submitted by non-POU entities must include a signed Letter of Support from the appropriate POU confirming: 1) support for the project in its utility territory and, 2) approval to access the necessary infrastructure, equipment, real estate, customer data, and other needs to complete the project. Failure to include a Letter of Support will result in an incomplete application and disqualification.

If a POU is the applicant, no additional Letter of Support is required, but the application must still provide the above description regarding compliance.

Joint applications submitted by a non-POU entity and a POU as co-applicants are allowed, and no additional Letter of Support and approval is required (although the application must still provide the above description regarding compliance).

Applications proposing non-grid-connected projects must also submit a Letter of Support and approval from the POU confirming awareness the project is occurring in their territory and support for household savings calculations, as necessary.

b) Community-Based Organization (CBO) Letter of Support

All applications must include at least one CBO partner to help execute tasks related to LIDAC outreach and education. At least one CBO should be clearly identified at the time of application and must submit a Letter of Support confirming their participation in the

project and ability to implement the project tasks. Failure to include a CBO partner in the application will result in an incomplete application and disqualification. For this solicitation, the CBO partner must meet the following criteria:

- Has demonstrated experience with LIDAC outreach efforts within the proposed community's region.
- Has demonstrated knowledge of solar + storage deployment in LIDACs.

This requirement is optional if a federally recognized tribal entity or a California Native American Tribe is the sole applicant.

c) **Optional Letters of Support**

Applicants may include optional support letters from federally recognized tribal entities and California Native American Tribes, technology partners, community leaders, workforce development stakeholders, environmental justice organizations, or other partners that explains how the proposed project is beneficial to LIDACs and the community and both feasible and viable in the identified location.

4. Workforce Development

Applicants should consider workforce development, education, and training during project planning and completion. Workforce development and training programs will train participants for transferable jobs and skills, resulting in high-quality jobs that reflect California Solar for All goals and priorities.

Applicants are encouraged to leverage resources and align with programs from the California Employment Development Department (EDD) where applicable.

5. Consumer Protection

Applications must describe how the project will ensure consumer protection. At a minimum, projects shall, unless the Applicant proves it infeasible, require contractors to provide at least a 10-year workmanship warranty for no-cost repair or replacement of the systems, as well as a performance monitoring and reporting service to alert customers if maintenance is needed. For community solar plants, developers must maintain operational logs, insurance, and permit financial audits.

CEC will require use of the CPUC [California Solar Consumer Protection Guide](#) or an equivalent mandatory consumer guide for grants delivering rooftop solar for residential customers. No additional or new guide will be required if the POU territory already has one available and in use. If using the CPUC California Solar Consumer Protection Guide, the applicant will add a coversheet explaining where their billing systems or solar policies differ from the Investor-Owned Utilities.

Review Appendix A for additional federal requirements related to consumer protection.

6. Reporting Requirements

Grant recipients must provide information needed for the CEC to complete required reporting to the US EPA, including performance reports and transaction-level and project-level data. Reports are completed semi-annually and there is a final report at the end of the grant period. This

information includes environmental, geographical, and social outputs and outcomes from the supported project(s), including:

Climate and Air Pollution Benefits:

- Solar capacity installed (MW)
- Storage capacity installed (MWh)
- Clean energy generation (MWh)

Community Benefits

- Number of households benefitting from projects (#)
- Amount of household savings delivered (\$ and %)
- Average savings per household benefitting (\$)
- Average household electricity bill in the utility territory (\$)
- Number of workers trained by workforce development programs
- Number of solar jobs created
- Average increased wages for individuals working in solar energy (%)

Market Transformation Benefits

- Number of Community-Based Organizations engaged (#)

For grants with projects that must comply with Davis Bacon and Related Act (DBRA) and Build America, Buy America (BABA), additional reporting requirements will apply to confirm adherence with these statutes and related regulations. This will include personnel and wage data for DBRA compliance. For DBRA, compliance documentation system and payroll systems must be in place to facilitate required data collection and reporting. Recipients will need to engage in pre-construction activities with Compliance Officers or Personnel. For projects that must comply with DBRA, there are weekly payroll monitoring and records retention requirements. Records must be retained for the length of the project and three years after the termination of the project. Review Appendix A for more details.

By receiving funding, the recipient agrees to share information with the CPUC, the prime grantee of the EPA Solar for All award, or the CPUC's designees.

7. State Prevailing Wage

Projects that receive an award of public funds from the CEC often involve construction, alteration, demolition, installation, repair or maintenance work over \$1,000. For this reason, projects that receive an award of public funds from the CEC are likely to be considered public works under the California Labor Code. See Chapter 1 of Part 7 of Division 2 of the California Labor Code, commencing with Section 1720 and Title 8, California Code of Regulations, Chapter 8, Subchapter 3, commencing with Section 16000.

Projects deemed to be public works require among other things the payment of prevailing wages, which can be significantly higher than non-prevailing wages.

By accepting this grant, the grant recipient as a material term of this agreement shall be fully responsible for complying with all California public works requirements including but not limited to payment of prevailing wage. Therefore, as a material term of this grant, the grant recipient must either:

- (a) Proceed on the assumption that the project is a public work and ensure that:
 - i. prevailing wages are paid; and
 - ii. the project budget for labor reflects these prevailing wage requirements; and
 - iii. the project complies with all other requirements of prevailing wage law including but not limited to keeping accurate payroll records, and complying with all working hour requirements and apprenticeship obligations;

or,

- (b) Timely obtain a legally binding determination from the California Department of Industrial Relations or a court of competent jurisdiction before work begins on the project that the proposed project is not a public work.

Awarded projects must comply with both state and federal prevailing wage requirements. Please see Section 8 below and Appendix A for details on federal requirements.

8. Additional Federal Compliance Requirements

Applicants must demonstrate how the following federal compliance requirements will be met:

- A) Davis-Bacon and Related Acts (DBRA): Applications must describe how the project will meet applicable DBRA compliance, reporting, and certification requirements for prevailing wage. Review Appendix A for details.
- B) Build America, Buy America (BABA): Applications must describe how the project will meet applicable BABA compliance, reporting, and certification requirements for domestic sourcing. Review Appendix A for details.
- C) Free and Fair Choice to Join a Union
- D) Climate-Related Financial Risks
- E) National Historic Preservation Act, Archaeological and Historic Preservation Act and Uniform Relocation Assistance and Real Property Acquisition Policies Act.

III. Application Evaluation

All applications are initially subjected to the “Screening” stage to assess if they meet the minimum requirements listed as Screening Criteria in III.A. Applications passing all screening criteria are advanced to the “Scoring” stage, where they are scored based on the Scoring Criteria listed in III.B.

The CEC may conduct a clarification interview with an applicant to clarify and/or verify information in its applications as needed. All final determinations shall be made solely by CEC.

A. APPLICATION SCREENING

An application must pass all screening criteria listed below to progress to the Application Scoring stage of the evaluation process.

Screening Criteria	Pass / Fail
1. The application is received by the due date and time specified in the “Key Activities Schedule” (which will be specified in the final solicitation manual) and is received in the required manner.	Pass / Fail
2. The application proposes an eligible project as defined in Section II.B and the applicant agrees to comply with all requirements including those described in Section II.C and Appendix A.	Pass / Fail
3. If the applicant has submitted more than one application, each application’s proposed project does not overlap with respect to locations and project beneficiaries.	Pass / Fail
4. The application includes a Letter of Support from at least one Community Benefits Organization (CBO), signed by an authorized representative, that outlines their experience, their planned contribution and details community benefits, workforce development, and/or LIDAC outreach tasks. This requirement is optional if a federally recognized tribal entity or a California Native American Tribe is the sole applicant.	Pass / Fail
5. [If applicable] For non-POU applicants, the application includes the required Letter of Support from the appropriate POU confirming support for the project in its utility territory and confirming approval to access the necessary infrastructure, equipment, real estate, customer data, and other needs to complete the project.	Pass / Fail
6. [If applicable] For new residential construction, the application describes how the proposed project will exceed the California Building Energy Efficiency Standards (Title 24, Part 6 of the California Code of Regulations) requirements. An exception will be made if the project will serve fire-affected areas of Los Angeles and Ventura Counties covered by EO-N-4-25 .	Pass / Fail

B. APPLICATION SCORING

Applications that pass all Application Screening criteria will be moved to the Application Scoring stage and be assessed based on the Scoring Criteria and the Scoring Scale described below.

1. Scoring Criteria

There are 7 total Scoring Criteria with points assigned to each, divided into 4 Criteria totaling 100 Base Points and 3 Criteria totaling 30 Preference Points, as summarized below:

Criteria	Base Points (Criteria 1-4)	Maximum Points
1	Project Description and Alignment with Program Requirements	20
2	Project Readiness and Work Plan	30
3	Project Benefits	25
4	Cost-Effectiveness and Budget	25
	Maximum Base Points	100
	Preference Points (Criteria 5-7)	
5	Project Type	5
6	Match Funding	10
7	Benefits to Federally Recognized Tribal Entities and California Native American Tribes	15
	Maximum Preference Points	30

Each criterion has an assigned number of possible points and is divided into multiple sub-criteria. The sub-criteria are not equally weighted. The narrative included in the application should respond to each sub-criterion to avoid losing points, unless otherwise indicated. The responses must directly relate to the solicitation requirements and focus, as stated in this solicitation.

a. Base Points

Base Points: Scoring Criteria 1-4	Maximum points
1. Project Description and Alignment with Program Requirements <i>Project Description:</i> a. Describes the project and the eligible technologies proposed. Describes why the technologies were selected. b. Describes LIDAC categories served, including plans for outreach and enrollment. c. Describes geographic location and utility territory of the proposed project. d. Describes ownership (e.g., direct ownership, third-party ownership) e. Includes optional additional support letters from tribes, technology partners, community leaders, workforce development stakeholders, environmental justice organizations, or other partners that explains how	20

the proposed project is beneficial to LIDACs and the community and both feasible and viable in the identified location. <i>Need for Funding:</i> f. Identifies, documents, and justifies the degree to which CEC funding (in addition to other funding mechanisms) is essential to address market, financial, and policy barriers that are hindering project development, including the project scope and timeline that can be completed with and without CEC funding.	
2. Project Readiness and Workplan a. Describes the project team (structure, qualifications, experience), financial stability, and capabilities to complete the project. Highlights key successes from past projects. b. Includes an organization chart that highlights the prime recipient and project partner(s). c. Describes resources available to support the project, including access to the necessary facilities, infrastructure, equipment, real estate, customer data, and other needs to complete the project. Explains how the above resources will be used. d. Outlines the major project tasks and how they will be managed. e. Includes a realistic project schedule, with milestones, for ensuring funds will be spent (not encumbered) by the end of the period of performance, April 30, 2029. f. Explains success and risk factors (e.g., supply chain, environmental, construction, project cost) and outlines a risk management plan to mitigate project risks. g. Demonstrates project readiness and compliance with applicable permitting requirements. Evidence and documentation may include, but is not limited to, proof of legally binding site control, CEQA review status, siting permits obtained (or verification of no permit required), project performance deposits or commitments to pay necessary interconnection costs and signed interconnection agreements. h. If leveraging siting and permitting resources, such as the CalAPP online solar permitting platform to verify code compliance, please describe. i. Describes how the project will meet applicable Build America, Buy American (BABA) compliance, reporting, and certification requirements. Provides documentation (e.g. certification letters) that the project will be able to procure BABA-compliant equipment and materials, if applicable. See Appendix A for further details. j. Describes how the project will meet applicable Davis-Bacon and Related Acts (DBRA) compliance, reporting, and certification requirements. Describes previous experience complying with DBRA or similar state or local requirements. See Appendix A for further details.	30

3. Project Benefits a. Describes and quantifies estimated benefits of the proposed project: – Planned solar capacity (MW) ▪ [If storage is included] Planned storage capacity (MWh) – Planned energy generation (MWh) annually (and cumulative) over 5 years, including a description of the methodology used to estimate this ▪ [If storage is included] Planned energy stored and consumed later (MWh) annually (and cumulative) over 5 years, including a description of the methodology used to estimate this b. Describes how the project will reduce greenhouse gas emissions or air pollutants c. Describes the intended usages of any on-site co-located equipment supplied (entirely or partially) by the project’s solar facility and benefits to the community of such end uses. d. Describes how the energy output of the total system (solar only or solar plus storage) is allocated among the following: LIDAC households (and how many), non-LIDAC households (and how many), any on-site co-located end uses, and exports to the grid. e. Describes bill savings benefits for LIDAC beneficiaries (with and without individual electricity bills), including description of a methodology for achieving savings of 20% or greater of the average household’s annual electricity expenditure for a period of at least 5 years (see Appendix B for further guidance). – Specifies the timeframe (e.g. monthly, annually) for the 20% savings calculation that closely aligns with the electricity costs households will pay while they benefit from the program. Identifies how frequently the bill discount calculation will need to be updated. – Describes a mechanism to ensure bill savings will remain with the LIDAC beneficiary even if the resident moves to a new location within the service territory.	25
4. Cost-Effectiveness and Budget a. Maximizes the project’s cost-effectiveness by minimizing the project’s “cost metric” (CM), where CM (\$/MWh) is computed by dividing the CEC funds requested for the project by the total quantity of solar-produced energy delivered to LIDAC beneficiaries over 5 years for bill savings, including a description of the methodology used to estimate the delivered energy and a workpaper to show the calculation of the project’s annualized and cumulative delivered energy and the project’s CM. Thus, the lower the CM, the better the score. The project’s cost-effectiveness will be assessed and scored in the following manner:	25

– The difference between the lowest and highest CM projects of the submitted applications passing the screening criteria will be divided into 10 equal CM bands. Projects with CM in Band 1 (lowest CM band) will receive 100% of the available points, while projects with CM in Band 10 (highest CM band) will receive 10% of the available points. Projects with CM in an intermediate Band N will receive a score of $\{100\% - [(N-1) \times 10\%]\}$ of the available points. Each band includes the highest end of the band but not the lowest end, except Band 1 includes both ends. b. Describes a budget that is reasonable and justified with supporting documentation and includes budget forms that are filled out completely and accurately. c. Demonstrates the financial ability of the Applicant and key project partners to successfully implement the proposed project and continue operations for the duration of the CEC Solar for All contract term and beyond. d. Identifies project risks in the financial plan and effective strategies to manage and mitigate those risks.	
Total Possible Base Points (criteria 1-4)	100

b. Minimum Passing Score

An application must achieve a minimum passing score of 70 percent (70 base points) in total for criteria 1-4 and must score at least 70 percent in each of the four categories to be considered for funding or to be eligible for preference points listed below.

c. Preference Points

Preference Points: Criteria 5-7	Maximum points
5. Project Type Preference points shall be awarded for applications proposing associated energy storage and/or community solar projects as follows: a. Energy storage* (associated with solar PV): 3 points b. Community solar: 4 points c. Community solar paired with associated energy storage*: 5 points <i>*Projects proposing energy storage must meet the additional CEC requirements listed in II.B.1 to be eligible for preference points.</i>	5

6. Match Funding Preference points shall be awarded on a sliding scale to proposals including at least 10 percent match funds. Commitment letter(s) required.		10
Percentage of match (cash and in-kind) funds	Preference Points	
10-19	1	
20-29	2	
30-39	3	
40-49	4	
50-59	5	
60-69	6	
70-79	7	
80-89	8	
90-99	9	
100 or more	10	
7. Benefits to Federally Recognized Tribal Entities and California Native American Tribes Preference points shall be awarded on a sliding scale to proposals providing benefits to federally recognized tribal entities, and/or California Native American Tribes demonstrating LIDAC status, based on the proportion of tribal households out of total number of households (tribal AND non-tribal) served by the project. For example, if an application for a community solar project proposes to serve 600 households and 300 of those are federally recognized tribal entities and/or California Native American Tribe households demonstrating LIDAC status, the application would earn 10 preference points. (300 tribal / 600 total households = 50% = 10 preference points)		15
Proportion of tribal households out of total number of households (tribal AND non-tribal) served by the project.	Preference Points	
1-5	5	
6-30	7	
31-75	10	
76-100	15	
Total Possible Preference Points (criteria 5-7)		30
Total Possible Base Points (criteria 1-4)		100
Total Possible Points		130

2. Scoring Scale

% of Possible Points	Interpretation	Description
0%	Not Responsive	Response does not include or fails to address the requirements being scored. The omission(s), flaw(s), or defect(s) are significant and unacceptable.
10-30%	Minimally Responsive	Response minimally addresses the requirements being scored. The omission(s), flaw(s), or defect(s) are significant and unacceptable.
40-60%	Inadequate	Response addresses the requirements being scored, but there are one or more omissions, flaws, or defects or the requirements are addressed in such a limited way that it results in a low degree of confidence in the proposed solution.
70%	Adequate	Response adequately addresses the requirements being scored. Any omission(s), flaw(s), or defect(s) are inconsequential and acceptable.
75%	Between Adequate and Good	Response better than adequately addresses the requirements being scored. Any omission(s), flaw(s), or defect(s) are inconsequential and acceptable.
80%	Good	Response fully addresses the requirements being scored with a good degree of confidence in the applicant's response or proposed solution. No identified omission(s), flaw(s), or defect(s). Any identified weaknesses are minimal, inconsequential, and acceptable.
85%	Between Good and Excellent	Response fully addresses the requirements being scored with a better than good degree of confidence in the applicant's response or proposed solution. No identified omission(s), flaw(s), or defect(s). Any identified weaknesses are minimal, inconsequential, and acceptable.
90%	Excellent	Response fully addresses the requirements being scored with a high degree of confidence in the applicant's response or proposed solution. Applicant offers one or more enhancing features, methods or approaches exceeding basic expectations.
95%	Between Excellent and Exceptional	Response fully addresses the requirements being scored with a better than excellent degree of confidence in the applicant's response or proposed solution. Applicant offers one or more enhancing features, methods or approaches exceeding basic expectations.
100%	Exceptional	All requirements are addressed with the highest degree of confidence in the applicant's response or proposed solution. The response exceeds the requirements in providing multiple enhancing features, a creative approach, or an exceptional solution.

APPENDIX A: Federal Compliance Requirements

A. DAVIS-BACON AND RELATED ACTS⁴

Davis Bacon Act (40 USC 3141-3148), Contract Work Hours and Safety Standard Act (40 USC 3701-3708), and Copeland “Anti-Kickback” Act (40 USC 3145), collectively Davis Bacon and Related Acts (DBRA) apply to this program.

Davis-Bacon Act, requires payment of local prevailing wage rates for laborers and mechanics on construction contracts of \$2,000 or more⁵; Copeland “Anti-Kickback” Act prohibits a contractor or subcontractor from inducing an employee into giving up any part of the compensation to which he or she is entitled; and Contract Work Hours and Safety Standards Act requires overtime wages to be paid for over 40 hours of work per week, under contracts in excess of \$100,000.

All projects whose construction is funded by Solar for All must comply with all DBRA requirements. While the CEC will provide technical assistance and informational resources, grant recipients are responsible for complying with DBRA requirements. Be advised that if Solar for All federal funds are used for solar components on a new construction project, DBRA requirements may apply to the entire property⁶.

For Solar for All, DBRA requirements do not apply to⁷:

1. Financial Assistance which exclusively funds pre-construction (e.g. permitting or design work) or post-construction activities (e.g. subsidies for subscriptions to already constructed solar assets).
2. Financial Assistance which serves end-users who are individual homeowners or tenants of single-family homes or multifamily buildings when these individual end-users ultimately select the contractor(s) and execute the contract(s) for the construction work, as opposed to the CEC or a contractor hired by the CEC.
3. Financial Assistance which serves end-users who meet the definition of Federally Recognized Tribal Entities who ultimately select the contractor(s) and executes the contract(s) for the construction work, as opposed to the CEC, grant recipient, or a contractor hired by the CEC or grant recipient.
4. Financial Assistance which serves any end-user when such Financial Assistance is less than \$250,000 for a project and the end-user ultimately selects the contractor(s) and executes the contract(s) for the construction work, as opposed to the CEC, grant recipient, or a contractor hired by the CEC or grant recipient.

Grant recipients will be required to comply with the requirements of DBRA, including obtaining weekly certified payroll from contractors, incorporating DBRA language into contracts with

⁴ US EPA “Davis-Bacon and Related Acts (DBRA)” <https://www.epa.gov/grants/davis-bacon-and-related-acts-dbra>

⁵ The Secretary of Labor’s wage determinations are available at <https://sam.gov/content/wagedeterminations>.

⁶ EPA applies the Purpose, Time, and Place (PTP) test to define the scope of a project. Additional information on the PTP test is provided below.

⁷ US EPA Solar for All Terms & Conditions (12/3/2024)

contractors, ensuring job sites display relevant DBRA posters, and reporting on DBRA compliance to the CEC by maintaining records of certified payrolls, personnel interviews, and apprenticeship and trainee programs for a period of three years after project completion. Selected contractors must abide by the terms provided in the [DBRA Requirements for Contractors and Subcontractors Under EPA Grants](#).

For additional information on Davis-Bacon please refer to the US EPA Solar for All Terms and Conditions (12/3/2024) and the [US EPA DBRA webpage](#).

B. BUILD AMERICA, BUY AMERICA

Domestic preference for procurement, as implemented under 2 CFR 184 Buy America Preferences for Infrastructure Projects, under the Build America Buy America Act (Pub. L. 117-58) (BABA) applies to Solar for All Financial Assistance. Applicants who receive grant awards from the CEC are responsible for ensuring that they comply with BABA, where applicable. This requires manufacturer certification letters for every product used in each BABA-applicable project unless a valid waiver is in place. BABA certification letters are needed for each project and cannot be copied between projects. Contractors do not create the certification letter; the manufacturer of the item being purchased (e.g., the company producing the iron used on a project) is required to attest to the required information. Multiple items supplied from the same manufacturer may be listed on one certification letter. BABA-applicable projects will likely need multiple separate certification letters.

Please see the [EPA website on BABA](#) for more information.

Broadly, BABA requires that federal funds used in the construction of public infrastructure projects must comply with the following:

- 1) All iron and steel used in the project are produced in the United States—this means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States;
- 2) All manufactured products used in the project are produced in the United States— this means the manufactured product was manufactured in the United States; and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard that meets or exceeds this standard has been established under applicable law or regulation for determining the minimum amount of domestic content of the manufactured product; and;
- 3) All construction materials are manufactured in the United States—this means that all manufacturing processes for the construction material occurred in the United States. The construction material standards are listed below.

BABA applies to “public infrastructure,” which is defined broadly in 2 CFR 184.4(d). The following types of Solar for All projects are deemed infrastructure for the purposes of BABA applicability:

- 1) The public infrastructure portion of any property (e.g., retail in a mixed-use multi-family property) where the principal purpose of the Financial Assistance is to directly benefit such portion of the property;
- 2) Privately-owned commercial buildings when they meet the “public function” test;

- 3) Residential-serving community solar projects, which EPA deems “structures, facilities, and equipment that generate, transport, and distribute energy” per 2 CFR 184.4(c).

The following types of Solar for All projects are not deemed infrastructure for the purposes of BABA applicability:

- 1) Single family homes;
- 2) Privately-owned, non-mixed-use, multi-family housing properties;
- 3) Privately-owned residential portions of mixed-use properties;
- 4) Any privately-owned, behind-the-meter energy generation and storage project that does not otherwise meet the definition of infrastructure.

The inclusion of the following types of funding, support, guaranty, or sponsorship in the funding stack of any Solar for All project does not trigger BABA, in and of itself or in combination:

- 1) Low-Income Housing Tax Credit (LIHTC);
- 2) Fannie Mae and Freddie Mac Backed Multifamily Mortgages;
- 3) Federal Housing Administration Insured Multifamily Mortgages;
- 4) HUD Section 8 Funding;
- 5) Other Federal, State, Tribal, or Local Housing Assistance Funding Sources: in general, subsidies issued by federal, state, tribal, or local housing assistance funding sources that do not confer equity or ownership stakes for the governmental funding source do not trigger BABA applicability.

The ultimate determination on BABA applicability for a particular project is always fact-specific. BABA applicability is assessed at the time of provision of Financial Assistance based on the terms, limitations, and requirements of such Financial Assistance. Applicability does not change retroactively based on a change of use (e.g., if a ground floor apartment is re-zoned for a restaurant). Recipients may not temporarily modify or mischaracterize usage to intentionally avoid BABA compliance.

Applicants should be advised that if using Solar for All federal funds for structural components of a new construction project, such as roof reinforcements to support solar installation, BABA requirements may apply to the entire property. EPA applies the Purpose, Time, and Place (PTP) test to define the scope of a project. Additional information on the PTP test is provided below.

BABA Waivers

There are [program-wide BABA waivers](#) and project-specific BABA waivers. EPA has issued several program-wide waivers that may be applicable to certain projects. This includes a temporary BABA waiver for domestically assembled solar modules to some Solar for All awardees, including the State of California, on January 10, 2025. The waiver applies to expenditures on solar panels made on or after January 10, 2025, until December 31, 2025, so long as those panels are installed by June 30, 2026. EPA could issue additional program-wide BABA waivers in the future.

In addition, there is a general applicability waiver for De Minimis Costs; costs associated with a project subject to BABA which are de minimis to the overall project (no more than a total of 5% of total project cost) and a Small Project Waiver for projects under \$250,000.

There is also a general applicability waiver for Federally Recognized Indian Tribes. Awards and subawards provided to Tribes at or below \$2.5 million will be exempt from BABA requirements

under the following conditions: 1) The total prime federal award or subaward does not exceed \$2.5 million, 2) and the Federal award or subaward amount does not exceed \$2.5 million for the life of the award.

If you believe your project is covered by any of these or another program-wide waiver, notify the CEC in your application.

Project-Specific BABA Waiver⁸

Project-Specific BABA Waivers may be available under Section 70914(b) of BABA and 2 CFR 184.7 BABA requirements may be waived by US EPA where:

- 1) Applying the domestic content procurement preference would be inconsistent with the public interest;
- 2) Types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality; or
- 3) Inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25 percent.

C. PURPOSE, TIME, AND PLACE (PTP) TEST

The Purpose, Time, and Place (PTP) test⁹ is used to define the scope of a “project” for BABA and DBRA applicability. This ensures that projects are not intentionally separated into pieces as an attempt to avoid BABA or DBRA compliance. As an example, if federal funds provide \$1 to a qualified project involving construction work, as defined under 29 CFR Part 5, that also receives non-federal funds to ensure the completion of the same project, DBRA and BABA would apply to all construction work necessary to complete that project if the PTP test is met.

While each analysis will be fact specific, generally the PTP test will consider whether, regardless of the number of individual contracts, the contracts or activities funded are closely related in purpose, time, and place, thus forming a single project. The PTP test considers whether the activities are integrally and proximately related to the whole but also recognizes that many activities are undertaken in segregable phases that are distinct in purpose, time, or place. All three elements must be consistent for the activity to be considered a “project.”

Purpose: Is the purpose for the funded activity segregable? For example, are there clear and discrete phases in the project that separate solar panel installation from general construction, which indicates that solar serves a different purpose than general construction under the PTP test? Are the solar panels essential for residency (i.e., is a certificate of occupancy possible without the solar panels, and is there electricity without the solar, thereby making the panels ancillary rather than integral? A “yes” answer to both of these questions would indicate that solar serves a different purpose than general construction under the PTP test.

⁸ Build America, Buy America Act – Waiver Authority: <https://www.epa.gov/baba/build-america-buy-america-baba-overview>

⁹ Frequently Asked Questions for Build America, Buy America (BABA) Office of the Greenhouse Gas Reduction Fund: <https://www.epa.gov/system/files/documents/2025-01/ggrf-baba-faqs-implementation-procedures.pdf>

Time: Is the timing of the funded activity distinct? For example, in FY23, a state receives a cooperative agreement to develop the structure and guidance for a recycling grant program for their state. In FY24, the state award is amended, and it receives additional funds that will fund the grant pool. These are both distinct in purpose and time and would be distinct “projects.”

Place: A county receives a grant from the state in the “time” example above. The city plans to use the grant to fund two recycling facilities. One in the upper county and one in the lower county. Each has unique structural requirements. The place of the activity is distinct and would be distinct “projects.”

D. CONSUMER PROTECTION

The grant recipient agrees to carry out the following consumer protection requirements to the extent that the grant recipient directly interacts, transacts, or contracts with consumers in the provision of financial assistance:

- 1) Comply with the Equal Credit Opportunity Act, the Truth in Lending Act, the Consumer Financial Protection Act, and other federal consumer protection laws that apply;
- 2) Provide written disclosures to consumers containing information in clear and understandable language regarding purchasing, leasing, or financing as well as the costs associated with a consumer's transaction;
- 3) With regard to solar products or services, provide written disclosures on the impact of the solar project on the consumer's ability to sell or refinance their home and recording of any liens on the home; consumer rights; contact information for the solar project provider; and complaint procedures for the consumer if they have a problem with the solar project or sales process;
- 4) Require that all in-person and telephone marketing that directly interacts, transacts, or contracts with consumers be conducted in a language in which the consumer subject to the marketing is able to understand and communicate; and
- 5) Maintain a process for receiving, monitoring, and resolving consumer complaints, including ensuring that complaints are appropriately addressed and referring complaints, when necessary, to the appropriate government regulatory agency.

E. FREE AND FAIR CHOICE TO JOIN A UNION

In accordance with Executive Order 14082 (Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022), the Recipient agrees to design and implement a policy to increase high-quality job opportunities for American workers and improving equitable access to these jobs, including in traditional energy communities, through the timely implementation of requirements for prevailing wages and registered apprenticeships and by focusing on high labor standards and the free and fair chance to join a union.

In accordance with the EPA General Terms and Conditions, grant funds may not be used to support or oppose union organizing, whether directly or as an offset for other funds.

F. CLIMATE-RELATED FINANCIAL RISKS

The Recipient agrees to comply with Executive Order 11988 (Floodplain Management). This may include accounting for and evaluating practicable alternatives or other mitigation related to ameliorating flood risks and protecting flood plains as part of its financial risk management policies and procedures.

The Recipient agrees to comply with Executive Order 14030 (Climate-Related Financial Risk). This may include accounting for climate-related financial risks—including physical and transition risks—in its financial risk management policies and procedures.

G. NATIONAL HISTORIC PRESERVATION ACT, ARCHAEOLOGICAL AND HISTORIC PRESERVATION ACT AND UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES ACT

Notify and work with the CEC and US EPA if potential sites should fall under these Acts.

APPENDIX B: Household Savings Guidance

The following is guidance provided by US EPA in the Solar for All Notice of Funding Opportunity (NOFO), August 31, 2023. Recommend reviewing [US EPA Frequent Questions, “Meaningful Benefits”](#) for additional guidance. US EPA guidance is subject to change.

Delivering a minimum of 20% household savings to all households served under the program, including households in multi-family, master-metered buildings, is a requirement under this grant. 20% household savings is defined as 20% of the average household electricity bill in the utility territory. Household savings can be delivered as a direct financial benefit or, for households without an individual utility bill, a direct non-financial benefit equivalent in value to the program’s household savings target in the utility territory.

Applicants should calculate 20% household savings from the average electricity expenditures of the average household in the utility territory. This financial benefit does not need to be calculated per each individual household and can be based on averages in the utility territory the applicant is serving. Applicants should calibrate the calculation of this financial benefit to the frequency financial benefits are delivered to the households (i.e., monthly bill credits should deliver 20% household savings based on the monthly electricity bill). Each applicant will need to design a financial subsidy or product that delivers this financial benefit or the equivalent to all households served under this program.

Applicants may consider working with electric utilities and using data from the U.S. Energy Information Administration (including the [Residential Energy Consumption Survey](#) and [electricity](#) data) to calculate the average household annual utility costs.

Applicants will need to deliver these benefits net of any costs households incur from participating in the program. For example, if the program requires applicants to pay a subscriber fee, then the savings must exceed the fee so that households still experience a financial benefit of 20% the average household electricity bill. Applicants should ensure that if the program incurs any indirect costs on households, such as an increase in tax burden, the household savings calculation incorporates those costs and exceeds the 20% household savings accordingly.

For additional guidance for HUD Multi-Family Housing, see [guidance from U.S. Department of Housing and Urban Development \(HUD\)](#) on how to treat on-bill virtual net metering credits.

Delivering household savings for projects serving households who do not receive individual electricity bills (e.g., households master-metered, multi-family buildings) requires additional consideration since typically these savings are applied to electricity bills. For these households, household savings should be delivered as 20% of the average household electricity bill as a financial or non-financial benefit with an equivalent financial value that meaningfully improves the lives of households directly, as described in guidance from [U.S. Department of Housing and Urban Development](#).

Applicants are not required to value storage benefits financially; however, applications will be evaluated on how the proposal will use investments in storage to generate resiliency benefits for program beneficiaries.

Applicants must describe how savings will be verified within the grant period of performance, ending on April 30, 2029.

APPENDIX C: Terms and Conditions

In addition to information described in this document, the CEC's Solar for All program is subject to Terms & Conditions by the US EPA and General CEC Terms & Conditions. Relevant terms and conditions that grant recipients must comply with are linked below:

1. [US EPA Solar for All Terms and Conditions](#) (12/03/2024)
2. [US EPA General Terms and Conditions](#) (10/01/2023)
3. [Draft CEC Solar for All Terms and Conditions](#)