

DOCKETED

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**Solar for All (Publicly Owned Utilities Territories) Program
solicitation concept proposal**

Additional submitted attachment is included below.



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August 7, 2025

VIA ELECTRONIC MAIL

California Energy Commission
Docket No. 25-SOLAR-01
715 P Street
Sacramento, CA 95814

RE: Solar for All (Publicly Owned Utilities Territories) Program solicitation concept proposal

The Imperial Irrigation District (IID) appreciates the opportunity to provide input on the development of the California Energy Commission's (CEC) Solar for All Program.

IID is closely tracking this forthcoming Grant Funding Opportunity (GFO), which focuses on distributed solar and storage projects that serve disadvantaged communities. The concept proposal aligns with IID's strategic energy priorities and equity objectives, particularly those aimed at addressing the cost-shifting impacts of current rooftop solar programs and expanding access to clean energy for low-income customers within IID's service territory.

IID has identified community solar and associated storage as strong candidates under the eligible categories for this GFO. Our preliminary assessment suggests both project types are viable, with community solar emerging as the most promising for further development and stakeholder engagement.

To that end, IID is evaluating two potential community solar-plus-storage projects, each approximately 4–5 MW, specifically designed to deliver direct, measurable benefits to disadvantaged communities. In parallel, under the associated storage category, IID is also exploring opportunities to retrofit existing solar resources, such as the Citizens Solar and Niland PV facilities, with storage systems sized at approximately 20% of each facility's nameplate capacity. These upgrades would ensure at least 50% of the stored energy directly benefits low-income customers, in alignment with the program's equity goals while also enhancing grid performance and reliability.


Additionally, IID has initiated early-stage discussions with the Fort Yuma Quechan Tribe, who has expressed interest in partnering on a community solar-plus-storage project. The Tribe has identified land adjacent to IID's Winterhaven Substation as a potential site,

presenting a strong opportunity to build on our existing collaboration through the long-duration storage GFO with CMBLu. While behind-the-meter applications are limited to 1 MW, IID's proposed model, interconnecting through our distribution system and design to delivering energy credits to low-income customers, aligns with the program's objectives and ensures broader community benefit.

IID appreciates the program's emphasis on project readiness, cost-effectiveness, and meaningful partnerships. To support a strong and competitive application, we are actively engaging internal teams to ensure our proposal reflects with community needs and is positioned for successful implementation.

Thank you for the opportunity to provide input as the CEC finalizes the Solar for All Program framework.

Sincerely,
Smelser,
Matthew H
Matt Smelser
Power Department Manager



Digitally signed by Smelser,
Matthew H
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