

DOCKETED

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Reactivateâ€™s comments- CEC Solar for All Draft RFP

Additional submitted attachment is included below.

August 11, 2025

Submitted via email to docket@energy.ca.gov

California Energy Commission
Docket Unit, MS-4
Docket No. 25-SOLAR-01

Re: Reactivate's Comments on CEC's Solar for All Program Draft Solicitation Concept Proposal

Dear Director Carillo,

Reactivate DevCo, LLC ("Reactivate") appreciates the opportunity to submit comments in response to the California Energy Commission's Solar for All Program Draft Solicitation Concept Proposal for Publicly Owned Utilities ("POUs").

Reactivate, an Invenergy company, is a mission-driven company that develops, owns, and operates renewable energy solutions to improve low-to-moderate income and energy transition communities across the country. Our focus areas include community solar, commercial & industrial solar, small utility scale solar, energy storage, and EV charging projects. By delivering economic development and energy resiliency with renewable energy solutions, Reactivate provides energy cost savings, job opportunities, workforce training, and opportunities for businesses, creating positive social and environmental impact.

Based on our leadership team's decades of experience in the renewable energy sector, our comments emphasize best practices in solar program design and project development, leveraging our team's extensive experience in program implementation, project development, finance, low-to-moderate income (LMI) community impact, workforce training, enhancing access to contracting opportunities for all, and maximizing economic and social impacts through distributed solar and storage deployment. Reactivate has projects throughout POU service territories and looks forward to submitting proposals into future solicitations.

Should you have any questions or require further clarification regarding any aspect of our comments, please do not hesitate to contact me. We appreciate the opportunity to submit these comments and look forward to the opportunity to support the successful implementation of CEC's Solar for All Program.

Thank you for your consideration.

Tom Figel

VP, Policy
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Reactivate Comments

(1) Minimum / Maximum Funding Amounts

Reactivate recommends lowering the minimum CEC grant award to \$1M and the maximum CEC grant award to \$7M. This will allow more projects to be funded and potentially attract more match funding to support the program, stretching the grant dollars and program impact further.

(2) Tribal Scoring Preference

Reactivate strongly supports expanding clean energy benefits for Tribal communities and Tribal preference through CEC's solicitation.

The structure of current preference points may have the unintended consequence of reducing project capacity in order to maximize preference scoring. Many POU's do not serve Tribal communities, or only a small number of Tribal households. If a project is located in one of these POU's, a respondent may reduce the size of the project to maximize the proportion of households served by the project in order to maximize their preference points, leading to an overall smaller project size and less overall benefit.

To avoid this unintended consequence, Reactivate recommends allowing points for either serving the maximum percentage of Tribal households based on the proportion of Tribal households out of the general population in that utility service territory, or, broadening the scoring to a more qualitative commitment to Tribal benefits. Qualitative commitments could include other benefits, such as serving nonprofits and other service providers who benefit Tribes anywhere in CA, not specific to the service territory, contracting with Tribal businesses, and providing workforce development opportunities.

(3) Preferred Provider References

CEC has a unique opportunity to facilitate networking and information sharing among POU's, Tribes, and developers by creating a space for those open to partnerships to share their interest and project information. As a mission-driven developer, Reactivate has a strong interest in such partnerships. We recommend CEC gather information from interested developers and Tribes, through a subsequent Request for Information, workshop, or through Technical Assistance under the program to provide interested Tribes and POU's with a list of providers they may consider for potential partnership.