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Feedback on CEC Solar For All Solicitation Concept Proposal

Additional submitted attachment is included below.



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August 11th, 2025

California Energy Commission
 Docket No. 25-SOLAR-01
 715 P Street
 Sacramento, CA 95814-5512

RE: Feedback on CEC Solar For All Solicitation Concept Proposal

Brightline Defense (“Brightline”) greatly appreciates the opportunity to provide feedback on the development of the CEC’s Solar for All (POU Territories) program. Brightline is an environmental justice (“EJ”) organization based in San Francisco, California, that focuses on advancing clean energy access and workforce development in local communities that bear disproportionate environmental burdens. Following our role in the successful closure of the Potrero Power Plant, a longstanding source of pollution in Southeast San Francisco, we advanced policies such as GoSolarSF and CleanPowerSF, linking renewable energy adoption with targeted local hiring strategies.

Brightline recognizes Solar for All (“SFA”) as a meaningful step to accelerate more equitable deployment of solar energy in low-income and disadvantaged communities (LIDACs). Our feedback on the CEC’s proposed solicitation for SFA focuses on strengthening access, workforce development, and community benefits.

Recommendations:

1. Ensure Equitable Access to SFA with Thoughtful Implementation of Project Requirement 1: LIDAC (*Section II C #1*)

We support the requirement for projects to serve LIDAC communities. To ensure SFA reaches EJ communities in various regions across California, we further encourage the CEC to **ensure communities from all four of the LIDAC beneficiary categories are served in the final selection of applicants**. This can be done by giving higher preference to applicants that demonstrate an ability to serve multiple categories, or simply by ensuring more distributed coverage among final applicants. This is crucial to ensure SFA serves EJ communities from diverse regions, which may not occur if all applicants serve only a single category. For example, if all applicants demonstrate an ability to serve only DACs recognized by CalEnviroScreen, this could result in the exclusion of some EJ communities in the Bay Area, Central Coast, and North Coast, given the tool’s underrepresentation of certain environmental and socioeconomic stressors, potential bias against immigrant demographics, and high statistical sensitivity.¹

¹Benjamin Q. Huynh et al., “Mitigating Allocative Trade-Offs and Harms in an Environmental Justice Data Tool,” Nature Machine Intelligence, February 16, 2024
<https://doi.org/10.1038/s42256-024-00793-y>

2. Encourage Local Workforce Development by Modifying Project Requirement 4: Workforce Development (*Section II C #4*)

We support the requirement for applicants to consider workforce development under project requirement 4 in Section II C. Based on Brightline's prior experiences promoting local resilient economies in clean energy development, we recommend the CEC modify this requirement to read:

“Applicants should offer workforce development, education, and training during project planning and completion, **with priority given to local and disadvantaged communities facing barriers to employment. This includes providing comprehensive, wraparound career services, such as pre-apprenticeship programs, Vocational English as a Second Language (VESL), and continuing education, as well as childcare, housing assistance, and other retention support.**² These programs will train participants for transferable jobs and skills, resulting in high-quality careers 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.

Further, applicants should demonstrate a clear commitment to meet hiring targets for local and disadvantaged communities.³ They should submit plans for conducting targeted outreach to these communities, such as advertising job postings in local mailers and newspapers, and prioritizing interviews for applicants from these demographics as well as those referred by local job training or workforce development centers.⁴ Applicants should also demonstrate a proven record of investing in local economic growth, and providing equitable job opportunities. A detailed description of these efforts should be submitted.”

These modifications will help ensure SFA not only provides access to solar, but also to local economic development and high-quality careers for EJ communities.

3. Strengthen Enforceability of Community Benefits by Modifying Project Requirement 6: Reporting Requirements (*Section II C #6*), and Application Scoring Criteria 1a (*Section III Part B, Base Points #3*)

Brightline is a strong advocate for community benefits associated with clean energy projects, and we greatly appreciate the CEC's inclusion of specific reporting requirements for grant recipients to ensure projects deliver community benefits. We urge the CEC to also **require that grant recipients provide the number of local workers employed as a result of the project in semi-annual reports and the final report of the grant period.** This will help ensure local economic benefits throughout the duration of each project funded by SFA. The CEC should also

² Chinese for Affirmative Action and Brightline Defense Project. "The Failure of Good Faith: Local Hiring Policy Analysis and Recommendations for San Francisco." August 2010. https://www.reimaginerpe.org/files/The_Failure_of_Good_Faith-CAA_and_Brightline.pdf.

³ Ibid

⁴ Gross, Julian, Greg LeRoy, and Madeline Janis-Aparicio. *Community Benefits Agreements: Making Development Projects Accountable*. Good Jobs First and the California Partnership for Working Families, 2005. [https://proggov21-uploads.s3.amazonaws.com/uploads/asset/asset_file/CBAStudy\(1\).pdf](https://proggov21-uploads.s3.amazonaws.com/uploads/asset/asset_file/CBAStudy(1).pdf).

require that grant recipients provide the percentage of hours worked by temporary workers and the percentage of hours worked by permanent workers in all reports.

Additionally, we urge the CEC to make the following additions to the Project Benefits scoring criteria in Section III Part B, Base Points #3:

- **Projects the number of temporary and permanent jobs created by the project**
- **Outlines clear steps to hire and retain local workers, such as obtaining referrals from local union hiring halls**

In closing, we thank the CEC for their work in developing the SFA (POU Territories) program, and look forward to continuing to engage in this process.

Sincerely,
Eddie Ahn
Executive Director, Brightline Defense