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| <b>Document Title:</b>  | CMUA Comments Solicitation Concept Proposal for the Solar for All program |
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| <b>Filer:</b>           | System                                                                    |
| <b>Organization:</b>    | PRISCILLA QUIROZ                                                          |
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*Comment Received From: PRISCILLA QUIROZ  
Submitted On: 8/11/2025  
Docket Number: 25-SOLAR-01*

**CMUA Comments Solicitation Concept Proposal for the Solar for All program**

*Additional submitted attachment is included below.*



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August 11, 2025

California Energy Commission  
715 P. Street  
Sacramento, CA 95815

RE: Solicitation Concept Proposal for the CEC Solar for All Program

The California Municipal Utilities Association (CMUA) respectfully submits the following comments in response to the California Energy Commission's (CEC) Solicitation Concept Proposal for the Solar for All program (POU Territories), posted on July 11, 2025.

CMUA is a statewide organization of local public agencies in California that provide essential public services, including publicly owned electric utilities (POUs) that operate electric distribution and transmission systems that serve approximately 25 percent of the electric load in California. POUs have a longstanding commitment to delivering safe, reliable, affordable, and sustainable electricity, as well as the infrastructure necessary to support California's clean energy goals.

CMUA appreciates the opportunity to provide feedback on this concept proposal. Overall, CMUA appreciates the CEC's efforts to craft a flexible solicitation that considers the diversity of POUs and POU service areas, and offers the following comments and recommendations for consideration:

#### **Minimum/Maximum Funding Amounts**

CMUA recommends that the CEC should consider allowing a smaller minimum award amount to account for smaller POU territories that may not have the land or customer base to support a project requiring \$3,000,000 in funding. CMUA recommends that the minimum award amount be reduced to \$1,500,000, which would help ensure diversity in project territories and increase the number of projects that could potentially be funded. In order to encourage participation by smaller projects, CMUA recommends that the solicitation allow for a minimum allocation for awards below \$3 million.

Likewise, CMUA requests that the solicitation scoring for award amounts under \$3 million be modified to take into account unique circumstances surrounding smaller projects. For example, in the Base Points scoring criteria, the review of the Project Benefits looks at planned solar capacity and annual generation; it is important the total megawatts of a project are not used against a smaller project that could provide greater overall benefits based on the specific community needs. Larger projects are not necessarily going to provide greater benefits, and the Solar for All program should ensure that funds really are available to "All" and not just those that have the ability to develop large projects. Similarly, CMUA recommends that preference points for Match Funding be refined for smaller projects so as not to discourage communities from seeking out the funding for such projects.

#### **Eligible Project Costs**

CMUA recommends that the Solar for All solicitation explicitly states that funding can be used for software and billing system updates directly related to the project. Such updates may be necessary for participating POUs to distribute project benefits to customers effectively. These costs are essential to program success and should be recognized as eligible expenses. Without explicit acknowledgement that such costs can be

included, some communities may not be able to utilize the grant program as the cost of software and billing upgrades could be financially prohibitive.

### **Match Funding**

CMUA supports not requiring match funding but considering match funding as bonus points. This approach could ensure a wider reach for the Solar for All program and help to deploy projects without undue financial or administrative burden.

### **Low-Income and Disadvantaged Communities (LIDAC)**

CMUA supports the CEC's use of four pathways for defining low-income and disadvantaged communities for the purposes of the Solar for All Program.

### **Project Support Letters**

CMUA agrees that there should be a requirement for a letter of support from the POU for any project located within its utility service territory. However, as proposed, the scope of the POU Letter of Support is ambiguous and needs to be refined. CMUA is concerned that the overly broad description of the POU Letter of Support can create confusion regarding the list of items included therein and can be misconstrued by those reviewing the letter. For example, the "infrastructure, equipment, and real estate" necessary for the project may not be within the control of a POU and therefore, not something that the POU can "approve" or otherwise confirm. The solicitation must make clear that the POU's letter of support and approval for "access" is limited only to those matters that are solely within the control of the POU.

Furthermore, any approval for access to "customers data" must be limited to just that information that a POU can lawfully share and must recognize the limitations on disclosure of confidential customer information. Additionally, the solicitation should make clear that it is the project applicant, and not the POU, that is responsible for ensuring that project requirements have been met, and the POU cannot attest to the completeness of a project application and cannot necessarily confirm "other needs to complete the project."

Finally, determination and responsibility for the distribution of the bill credit and savings, and the value to customers are not necessarily going to fall within the purview of the POU, depending on the type of project and the details negotiated between the various parties.

### **Reporting Requirements**

The Solar for All solicitation should clarify the reporting period for the final report at the end of the grant period. CMUA recommends that the solicitation define the "end of the grant period" and clarify what information may be needed beyond the operational date of a project. For example, some of the data collected in the final report will require a period of solar generation and subsequent distribution of benefits. Assuming that the solar project is installed and operational by April 30, 2029, the solicitation should make clear what reporting requirements will continue after the period of performance.

We would like an opportunity to comment on the bill savings once the EPA guidance is available to acknowledge that proving the bill savings is important/challenging but we are all waiting for more guidance.

CMUA appreciates the CEC's consideration of these comments, and we look forward to continuing our collaboration with the CEC and other stakeholders on the Solar for All Program.

Sincerely,

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