

DOCKETED

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16-OIR-02 Vote Solar Comments on Staff Draft Barriers Study Recommendations

Additional submitted attachment is included below.



October 28, 2016

Via Electronic Filing

California Energy Commission Dockets Office, MS-4
Re: Docket No. 16-0IR-02
1516 Ninth Street
Sacramento, CA 95814-5512

Ref: Vote Solar's Comments on the California Energy Commission SB 350 Low-Income Barriers Study Staff Draft Recommendations

Dear Commissioners:

Vote Solar submits these comments on California Energy Commission's (CEC's) "SB 350 Low-Income Barriers Study Staff Draft Recommendations" ("Draft Recommendations") issued October 21, 2016. Vote Solar is a non-profit, non-partisan grassroots organization with members throughout the U.S. Vote Solar aims to foster economic opportunity and support a cleaner, healthier environment by bringing solar energy into the mainstream. Vote Solar is not a trade group and does not have corporate members. Since 2002, Vote Solar has worked in more than 20 states to remove market barriers and implement key policies needed to bring solar to scale. We have played a leadership role on shared clean energy programs across the country, and, along with the Interstate Renewable Energy Council, have published Model Rules for Shared Renewable Energy programs.

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In recent years, Vote Solar has stood with community and equity groups to advance solar programs with low-income provisions in California, Colorado, Massachusetts, and New York. Earlier in 2016, Vote Solar formally launched a Low-Income Solar Access Program, designed to expand access to solar technology, savings and jobs to the approximately 22 million low-income households nationwide. Vote Solar's program puts a particular focus on engaging and empowering low-income families and communities of color who are disproportionately impacted by the negative effects of the fossil fuel economy and have the most to gain from a transition to affordable clean energy. An initial program offering is a Low-Income Solar Policy Guide, which Vote Solar developed in conjunction with GRID Alternatives and the Center for Social Inclusion, and which the Commission included in the docket log for this report.¹

Vote Solar commends the Commission for its thoughtful draft policy recommendations following a comprehensive workshop and data gathering process in developing the Draft Report. CEC's policy recommendations are quite consistent with the principles outlined in our Low-Income Solar Policy Guide, which advocate that all programs that seek to expand access to solar should prioritize the following:

- **Accessibility and Affordability.** An effective low-income solar program combines opportunities to participate with real financial benefits through a combination of deep energy cost savings and direct support to overcome some of the financial and other challenges to access.

Community Engagement. A successful program requires partnership with communities through local partners such as community development corporations, housing organizations or other service providers to ensure that community needs and challenges are addressed and assets utilized. These partners can provide critical outreach, planning support, and engagement with low-income communities. Putting communities at the center ensures that programs are responsive and effective and helps maximize participation.

¹ Center for Social Inclusion, GRID Alternatives, Vote Solar, Low-Income Solar Policy Guide (2016) available at www.lowincomesolar.org.

- **Consumer Protection.** Programs should not create incentives for predatory lending or exploitation of communities for financial gain. Programs should have adequate consumer protection measures, disclosures, and accountability measures to ensure that financially vulnerable customers are not taken advantage of or otherwise compromised.
- **Sustainability and Flexibility.** A successful low-income solar program must encourage long-term market development and be flexible in order to best serve the unique low-income market segment over time and as conditions and circumstances change.
- **Compatibility and Integration.** Low-income solar programs and policies should be additive to existing renewable energy and energy efficiency programs, not undermine them. They should also integrate well with synergistic programs, such as low-income energy efficiency, workforce development, healthy home programs and others that address the intersection of equity, energy, and infrastructure.²

In particular, we applaud the Commission for prioritizing as its very first recommendation that “the state should take action to enable the economic advantages of community solar to be readily accessible to low-income and disadvantaged populations across the state.” Community shared solar provides renewable energy access for multiple customers from one clean energy project, enabling those who are renters or otherwise cannot host an onsite system to access the benefits of renewable energy. Community solar can make the most of siting potential in an area to maximize production and lower costs, and can facilitate participation in smaller increments that might not be financially viable as a stand-alone installation, which in turn requires a smaller financial commitment.

We see great potential for community solar to serve low-income and disadvantaged populations in California, but as we have noted in earlier comments, the IOUs’ Green Tariff Shared Renewables (GTSR) programs do not currently provide an affordable option for underserved customers, and therefore further policy alternatives are needed. We strongly support CEC’s recommendation 1(a) that policymakers authorize an exemption for low-income customers from fees that cause the costs of community solar to

² Ibid.

exceed the cost of onsite solar, as well as 1(b) and (c) which recommend that the Legislature direct the public owned utilities to develop low-income community solar offerings and recommend that the California Public Utilities Commission (CPUC) considers other policy options in its Net Energy Metering Phase 2 proceeding. We believe that developing community solar programs that work for low-income and disadvantaged Californians should be a top energy policy priority for the state in 2017, and we thank CEC for highlighting this priority.

In addition, we are in particular support of these other draft recommendations:

- Recommendation 3, which recommends expanding opportunities to expand funding for low-income and disadvantaged rooftop programs like the Single Family Affordable Solar Housing (SASH) and Multifamily Affordable Solar Housing (MASH) program. By expanding funding for these programs, the state would create long-lasting rooftop solar growth in underserved communities.
- Recommendation 8, which directs energy programs for underserved customers to prioritize involvement and collaboration with trusted and qualified community-based organizations (CBOs). We agree that the participation of CBOs will be critical for education and outreach to low-income and disadvantaged customers. We suggest that this recommendation go a step further regarding community engagement and note that CBOs should convene discussions of disadvantaged communities' desired path forward when programs are being designed, as well as note that CBOs can help investigate opportunities for disadvantaged communities to engage in ownership of clean energy projects.
- Recommendation 9, which supports the creation of a consumer protection task force to help prosecute any companies that are found to have engaged in predatory practices seeking to take advantage of low-income and disadvantaged Californians via clean energy programs. Consumer protection is critically important for all solar customers, and underserved populations are more

vulnerable and more at risk of being targeted than others.

- Recommendation 10, which urges CEC and CPUC to direct research, development, demonstration and market facilitation programs to include targeted benefits for low-income customers and disadvantaged communities. We especially agree with recommendation 10(c) that there would be much value in the CEC conducting analysis of potential business models that would create market opportunities for low-income customers and disadvantaged communities, particularly with respect to community shared solar business models. This is a relatively new, untested space where analysis of models that can really work would provide much needed information for policymakers here in California and around the country.

Vote Solar is grateful for the opportunity to submit these comments on the Draft Recommendations, and looks forward to further opportunities to help California reach its clean energy goals.

Respectfully submitted,



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