Comments on CalAPP program design

Additional submitted attachment is included below.

February 22, 2022

Subject: Docket 21-SOLAR-01 – CALSSA's comments on the CalAPP Preliminary Program Design Proposal

Dear California Energy Commissioners and staff:

Thank you for the opportunity to provide comments on the proposal for the CalAPP program's design.

The California Solar & Storage Association (CALSSA) has advanced the common interest of the solar and storage industry for over 40 years, making California the most robust market in the U.S. The association is the state's largest clean energy business group with over 700 member companies representing an array of businesses that manufacture, design, install, finance, and provide other resources to the growing local solar and storage market in California.

We look forward to the launch of the CalAPP program to provide grants to cities and counties to adopt SolarAPP+. Permitting hurdles are some of the largest roadblocks preventing the widespread adoption of rooftop solar. Automating permitting via SolarAPP+ would remove those roadblocks for standard residential systems. When San Jose automated their permitting for residential solar systems using homegrown software similar to SolarAPP+, the solar installed annually in San Jose increased sixfold. If CalAPP can replicate that success, even partially, across the state by spurring the adoption of SolarAPP+, California will be able to accelerate its progress to 100 percent clean energy.

Upon review of the CalAPP preliminary program design proposal, we would like to recommend the following:

The program should allow building departments to cover an array of costs associated with adopting SolarAPP+. The proposal states that building departments would not be able to cover the following costs in their grants:

- Computer hardware and computer equipment
- Maintenance and subscription costs for permit tracking software
- Any costs incurred or activities conducted prior to award of the grant

We would appreciate the CEC allowing the grants to cover these costs at the building department's discretion.

Computer hardware and computer equipment can aid building departments in adopting and using SolarAPP+. For example, inspectors could benefit from viewing SolarAPP+'s inspection checklist on a tablet. Tablets could also be useful for instances in which the inspector finds an aspect of the plans do not match the installation and allows the installer to modify the permit on-site via SolarAPP+. The inspector can then load the updated inspection checklist onto the tablet and pass the project, streamlining the process and saving valuable time on-site.

Permit tracking software could be helpful for building departments to adopt and use SolarAPP+. For example, building departments that use Accela, EnerGov, or some other GovTech software platforms in addition to SolarAPP+ could avoid manually transferring SolarAPP+ permits into their permit management system.

Additionally, we hope the CEC can recognize the importance of the grants covering SolarAPP+ adoption costs that have been incurred prior to the grants becoming available and can modify the proposed program before the launch. It would be antithetical to goals of spurring solar growth if building departments delayed adopting SolarAPP+ until the grants are available. Additionally, denying building departments that have already adopted SolarAPP+ the opportunity to receive the grants would essentially penalize early adopters, many of which have gone above and beyond navigating the early stages of the software and already spent unbudgeted staff time.

The grant application and fund collection process should be simple. We encourage the CEC to create a simple process for building departments to apply for and receive grants. The grants, while sufficient to cover the costs of SolarAPP+ adoption, are comparatively small in terms of building departments' overall budgets. An onerous process to receive the funds could prevent building departments from applying for the grants and adopting SolarAPP+.

To that end, we support that the CEC is planning "a very simple, limited application identifying the jurisdiction, funding level based on population size… and acceptance of all terms and conditions." However, we are concerned that the reporting requirements to receive the grants could be burdensome and a disincentive to apply for the funds. Currently, the reporting requirements are that "the claim for payment must be supported by proof of costs incurred, including a summary of staff completing grant activities, time spent and associated salaries, invoices for services related to the adoption of the software and training, and receipts for costs associated with the development of training materials and any training events." We would be happy to assist the CEC in creating streamlined reporting requirements.

Building departments with existing automated permitting should be able to receive grants to improve their processes and offerings. We would appreciate the CEC clarifying that building departments with existing automated solar permitting are eligible for funds if they expand the type of systems that are eligible to be automated or improve the experience or options for contractors. For example, San Francisco offers automated solar permitting for residential systems smaller than 4 kW. San Jose offers efficacious automated solar permitting for residential PV systems, but the process for setting up automated solar permitting for PV + storage systems is burdensome. Under the CalAPP program, we hope San Francisco would be allowed to receive a grant to increase the system size eligible for automated permitting and that San Jose would be allowed to receive a grant for improving their automated permitting process for PV + storage, likely by adopting SolarAPP+.

The CEC should clarify grant sizes for counties. The program design draft proposes setting the maximum funding award by population of the applicant. The draft is unclear which "population" a county should count – the total population, population of the unincorporated areas, or population of the regions the building department oversees (which might or might not be the same as the

population of the unincorporated area). We would appreciate the CEC clarifying how to calculate the maximum funding award amount for counties based on a clear definition of "population."

Thank you for consideration of our comments. We look forward to the launch of the program and hope the CEC can expedite the remainder of program development to allow for building departments to apply for the funds as soon as possible.

Sincerely,

Benjamin Davis
Policy Associate