

**DOCKETED**

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| <b>Docket Number:</b>   | 21-SOLAR-01   |
| <b>Project Title:</b>   | California Automated Permit Processing Program (CalAPP) |
| <b>TN #:</b>            | 241627  |
| <b>Document Title:</b>  | California State Association of Counties Comments       |
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*Comment Received From: California State Association of Counties*  
*Submitted On: 2/22/2022*  
*Docket Number: 21-SOLAR-01*

**Comments of the California State Association of Counties**

*Additional submitted attachment is included below.*



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February 22, 2022

California Energy Commission  
715 P Street  
Sacramento, CA 95814

*Via e-comment*

**Re: Docket No. 21-SOLAR-01 – California Automated Permit Processing Program**

To Whom It May Concern:

Please accept the following comments submitted on behalf of the California State Association of Counties (“CSAC”) in response to the California Energy Commission’s (“Commission’s”) request for comments on the development of the California Automated Permit Processing Program (CalAPP). As noted by the Commission, Senate Bill 129 (Ch. 69, Stats. 2021) appropriated \$20 million to the Commission to support a funding program for cities, counties, or cities and counties to establish automated, online solar permitting.

**Question 3: Stand-Alone vs. Integrated Tool** – CSAC urges the Commission not to foreclose the option to use California Automated Permit Processing Program funding to automate the permit process in addition to adopting the solar system permit validation provided by SolarAPP+. For agencies that lack existing municipal automated permit processing software, funding available pursuant to CalAPP could support a broader effort to streamline permit approvals beyond the project types supported by SolarAPP+.

**Question 4: Application Process** – CSAC urges the Commission to adopt a streamlined, over-the-counter grant process that offers counties funding to quickly implement SolarApp+ or any other similar streamlined permitting program. Examples of State of California grant programs based on such an approach include the Department of Housing and Community Development’s Permanent Local Housing Allocation Program and their SB 2 Planning Grant Program. Both programs included simple application forms, a streamlined review for pre-approved uses of funding, and over-the-counter non-competitive funding allocations. (see: “2021 PLHA Formula Application,” <https://www.hcd.ca.gov/grants-funding/active-funding/plha.shtml> and “2019; and “Notice of Funding Availability [SB 2 Planning Grants],” <https://www.hcd.ca.gov/grants-funding/active-funding/planning-grants/docs/2019-sb-2-planning-grants-application.pdf>).

**Question 6: Timing** – CSAC urges the Commission to allow reimbursement for eligible costs incurred prior to completion of a final grant agreement. Failing to include such a provision would disadvantage the numerous counties that have already taken action to adopt automated permitting at significant cost.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Chitzy", with a stylized flourish at the end.

Christopher Lee  
Legislative Representative