

DOCKETED

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Comment Received From: Paloma Sisneros-Lobato
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SPUR comments on the CalAPP Preliminary Program Design Proposal

Additional submitted attachment is included below.

February 22, 2022

Subject: Docket 21-SOLAR-01 – SPUR comments on the CalAPP Preliminary Program Design Proposals

Dear California Energy Commissioners and staff,

We are pleased to see the CalAPP preliminary program design proposals. Thank you for hosting a public workshop to get comments from the public on the proposal and for accepting written comments as a part of the process as well.

SPUR (San Francisco Bay Area Planning and Urban Research Association) is a nonprofit public policy organization that promotes good planning and government as well as sustainability and resilience throughout the Bay Area. With offices in San Francisco, San José and Oakland, we are recognized as a leading civic planning organization and respected for our independent and holistic approach to urban issues.

Currently deploying residential rooftop solar panels and storage can involve an arduous and time-consuming permitting process, driving up the cost of installing the systems, and reducing the number of systems installed. A streamlined, convenient, and user-friendly permitting process, such as SolarAPP+, will not only help more Californians to affordably install solar panels on their homes, but will also catalyze the state’s efforts to meet its ambitious climate action goals.

After reviewing the CalAPP preliminary program design proposals, we would like to recommend:

The grant application and fund collection process should be simple.

We encourage CEC to create an application process that is straightforward, streamlined, and user-friendly. Reducing the time and burden of applying will help building departments apply for funds, utilize funds, and ultimately adopt SolarAPP+ to streamline permitting in their jurisdiction. We support the goal that the CEC has laid out for a “simple, limited application identifying the jurisdiction, funding level based on population size as described below, and acceptance of all terms and conditions.” In the process of identifying additional requirements to include in the application, we encourage simplicity of applying and reporting continue to be prioritized.

Add to list of eligible costs.

In addition to current items listed, we recommend adding the following to eligible costs:

- 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

Physical computer equipment, hardware, and permit tracking software could be incredibly useful as a jurisdiction transitions to SolarAPP+. Integrating new software and updating current permitting processes will likely result in related upgrades. Such costs should be eligible under CalAPP grants.

Lastly, many jurisdictions are currently in the process of considering or piloting SolarAPP+. We hope that the CEC can determine a way to provide funding to these jurisdictions for costs incurred before the grants become available. These jurisdictions represent a cohort of early adopters of SolarAPP+. To stay true to the goal of

supporting solar growth as soon as possible, these jurisdictions should be eligible to receive funds once grants are available for costs associated with SolarAPP+ adoption.

The program offers grants to jurisdictions with existing automated permitting systems to improve their systems and processes.

There are a handful of jurisdictions in the state who have been leaders in adopting an automated online solar permitting system. These cities and counties should be eligible to apply for funds from the CalAPP program to further improve their system or add additional offerings within their existing system.

The program allocates funding for additional support from organizations throughout the state to encourage SolarAPP+ adoption and help jurisdictions adopt SolarAPP+.

Deploying the total CalAPP fund amount throughout the state will necessitate effective and broad sweeping outreach to all varieties of qualifying jurisdictions. Local organizations who have relationships with jurisdictions in their regions and an understanding of the importance of streamlined solar permitting could support outreach for this program. We recommend setting aside some funds to provide grants to local organizations who can support on-the-ground outreach and organizing. Working with local partners would enable the CEC to ensure nuanced support and outreach throughout the state.

We appreciate your consideration of these comments. We are eager for the launch of the CalAPP program and hope that the remaining program development process will be expeditious to ensure that cities and counties can start applying for funds as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Paloma Sisneros-Lobato". The signature is fluid and cursive, with a large initial "P" and "S".

Paloma Sisneros-Lobato
Policy Associate