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California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco CA 94102

Re: Comment on Request for Residential SGIP Equity Advanced Rebate Program

To the California Energy Commission,

The SB 350 Disadvantaged Communities (DAC) Advisory Group (DACAG) provides the following comment on the Request for Residential SGIP Equity Advanced Rebate Program (Request) from The Energy Coalition, Grid Alternatives, and Swell Energy, with support from the Golden State Finance Authority (GSFA). The Request was made in August 2022 as a public comment to the DACAG,¹ and again at our September meeting during our EPIC Priority Areas discussion.

The Request seeks to expand the existing Advanced Rebate Program (ARP) for the Self Generation Incentive Program's (SGIP) Residential Equity budget. Specifically, the Request pertains to the EPIC project, the Bassett Avocado Heights Advanced Energy Community Project,² which requires a sustainable model to lead an equitable transition to a clean and renewable energy economy.

Currently under the existing ARP, GSFA provides revolving loans to approved SGIP Equity and Resiliency Budgets (ERB) residential projects to the homeowner. The GSFA ARP program charges no fees and is at no cost to the homeowner or the installer. The program has so far assisted over 400 families with participation in the SGIP ERB program, and serves as a viable means to overcome the administrative delay in realizing SGIP-already-awarded funds.

The DACAG supports this Request and agrees that the gap financing provided by GSFA is a critical step towards scalable solutions. The Request presents an opportunity to accelerate SGIP payments and ensure that already approved battery storage projects realize the needed private capital for deployment. The DACAG recommends that the CEC expand the ARP program to include all participants in the Bassett Avocado Heights Advanced Energy Community Project. Similarly, the CEC should consider expanding the ARP program for other projects eligible for the SGIP Residential Equity Budget and other DAC and low-income programs that rely on the SGIP, including the San Joaquin Valley Pilot Projects Budget.

Sincerely,

The Disadvantaged Communities Advisory Group

¹ [The Energy Coalition Comments - Request for Residential SGIP Equity Advanced Rebate Program](#) (August 25, 2022)

² CEC Contract #EPC-19-006