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Dec 2, 2022

Clifford Rechtschaffen, Assigned Commissioner
California Public Utilities Commission
Via Email to:

Re: Comments on Rulemaking 20-05-012 Assigned Commissioner's Ruling (ACR) on Improving Self Generation Incentive Program Equity Outcomes and Assembly Bill 209 Implementation
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M497/K964/497964271.PDF>

Dear Commissioner Rechtschaffen, and all others this may concern,

The California Senate Bill 350 Disadvantaged Communities Advisory Group (DACAG) provides these brief comments on Rulemaking 20-05-012 Assigned Commissioner's Ruling (ACR) on Improving Self Generation Incentive Program Equity Outcomes and Assembly Bill 209 Implementation.

In the 11/18/2022 DACAG public meeting, this ACR was discussed, and we reference that recorded discussion with these comments.

One overall goal of the SGIP program and associated equity budget is the higher uptake and deployment of SGIP investments in disadvantaged communities (DACs) for the affordability, resilience, and reliability benefits the incentivized energy and storage systems are proven to provide. The current uptake by low-income communities and residences is insufficient, and the program's structure to date has not achieved sufficient participation, leaving a large portion of the equity budget unspent.

The DACAG's recommendations to increase participation by DACs includes the following:

- Govern the deployment of the funding to evolve away from first-come first-serve structure to a controlled deployment with low-income and equity resiliency investment reserves remaining available for a much longer term. This allows for appropriate time for under-resourced DACs to do the technical work to participate in the program. We also recommend separating the low-income budget from the medical baseline budget.
- Fund trusted regional technical assistance supports. Trusted, non-profit intermediaries familiar with SGIP and its details can help socialize the program among DACs. This is a method proven to work for complicated programs. Please see an example here: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/solar-in-disadvantaged-communities/dac-sash-2022-meo-plan_march-2022.pdf and the SB 350 Barriers Study: <https://www.energy.ca.gov/rules-and->

[regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350/sb.](#)

- Analysis is needed to continue social science on barriers to uptake by low-income constituents. We recommend analyzing medical baseline SGIP project locales by zip code to assess whether they are in DACs or low-income census tracts and therefore to better understand if certain DAC or low-income customers are indeed accessing SGIP funds, but qualifying through their medical baseline eligibility due to lower barriers for participation. We also suggest surveying customers of other related targeted programs, such as DAC-SASH, to help identify what these customers see as barriers or incentives to participation in SGIP.
- Electrical service upgrades are a larger part of implementation than anticipated. Electric panel upgrades, service size increases (e.g., 100 to 200 amps) are often immediately necessary and the project will not go forward without them. Also, low-income DAC housing stock is often degraded in other ways (roof replacement for solar panel hosting, electrical service upgrades). Allowing for SGIP projects to include these costs is a strong recommendation.
- Third-party project participation, e.g., upfront financing, need strong guidelines to avoid malfeasance and exploitation of DACs. There is already confusion in the residential solar and storage spaces where homeowners are besieged by solar energy offers, with no way to assess the viability, risks, and/or benefits. In addition to strong guidelines, this recommendation also includes reiteration of support for technical assistance described above. It may be useful to support vetted organizations that can help provide bridge financing between applications for SGIP and actual receipt of the incentive.
- Where providing proof of income and/or residing in deed-restricted housing are necessary to qualify for participation, these conditions often result in unnecessary barriers to participation. Consider enabling self-attestation of income to reduce these barriers, which can be verified through random audits of a small subset of customers, or at a minimum enable customers who qualify for CARE or FERA to participate without additional paperwork.

Respectfully,

The California Senate Bill 350 Disadvantaged Communities Advisory Group (DACAG)