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Project Title:	Solar for All Program
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Document Title:	CEC Solar For All Program Request for Information
Description:	The California Energy Commission (CEC) is seeking comments to inform planning and program design and potential grant funding opportunities for the CEC's portion of California's Solar for All award from US EPA. To facilitate public feedback, CEC staff has developed this Request for Information (RFI) with a list of questions in the Comments Request section of this document and seeks comments by February 28, 2025.
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STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY

CALIFORNIA ENERGY COMMISSION 715 P Street Sacramento, California 95814

energy.ca.gov CEC-70 (Revised 7/22) GATE OF CALIFORNES

Gavin Newsom, Governor

IN THE MATTER OF: CEC Solar For All Program

DOCKET NO. 25-SOLAR-01 REQUEST FOR INFORMATION RE: CEC Solar For All Program

# Request for Information CEC Solar For All Program Written Comments Due: February 28, 2025, at 5:00 p.m. PST

The California Energy Commission (CEC) is seeking comments to inform planning and program design and potential grant funding opportunities for the CEC's portion of California's Solar for All award from US EPA. To facilitate public feedback, CEC staff has developed this Request for Information (RFI) with a list of questions in the Comments Request section of this document and seeks comments by February 28, 2025.

On January 20, 2025, President Trump signed an Executive Order ("<u>Unleashing American Energy</u>") directing federal agencies to pause disbursement of funds appropriated through the Inflation Reduction Act. As of the date of this release, the CEC is reviewing and assessing the potential impact of this Executive Order on programs. Concurrently, CEC staff are moving forward with the planning to implement California's Solar for All program.

#### Background

California's Solar for All program, implemented through a multi-agency coalition, is currently in the planning phase, which may last up to one year from the agreement start date of December 16, 2024, per US EPA's guidelines. In the implementation phase, the program will provide funding to support investments in solar and storage systems deployed in low-income and disadvantaged communities (LIDAC) and with California Native American tribes. The California Solar for All program seeks to accelerate the equitable deployment of solar and storage, expand statewide decarbonization efforts, and reduce electric bill pressures on customers.

The Inflation Reduction Act (IRA), signed into law by President Biden in 2022, created a \$27 billion Greenhouse Gas Reduction Fund and includes \$7 billion for grant awards through <u>US EPA's Solar</u> for All competition across the country. The State of California was among one of the largest

awardees, receiving just under \$250 million to develop and implement a new California Solar for All program. California's application included a coalition of state agencies including the California Public Utilities Commission (CPUC), the California Employment Development Department (EDD), and the California Energy Commission (CEC).

The CEC's portion of the Solar for All grant will include a new program expecting to offer \$25 million in grant awards serving LIDAC and California Native American tribal residents in publicly owned utility (POU) territories. This program (CEC Solar for All) may encompass community solar, multifamily rooftop solar, single-family rooftop solar, or solar with associated storage systems, while seeking to achieve at least 20% electricity bill savings for program participants. CEC expects to finalize program requirements and begin accepting funding applications before the end of the year and to award grants to selected applications by early 2026.

#### **Comments Request**

Information and feedback is requested on the questions below, organized into 5 topic areas, related to participation in CEC's Solar for All program and to aid CEC in designing the program. Commenters are not required to respond to every question in this RFI but are encouraged to respond to any of the questions that align with their knowledge and experience.

The five topic categories are:

- (1) Program Structure,
- (2) Benefits,
- (3) Siting, Permitting, and Interconnection,
- (4) Consumer Protection, and
- (5) Quality Jobs.

### (1) Program Structure

CEC's Solar for All program is expected to provide \$25 million in grants for residential solar (singleand multi-family), community solar, and associated energy storage systems. The grants must benefit low-income and disadvantaged communities and California Native American tribal residents located in publicly owned utility (POU) territories. Funding must be disbursed by May 2029.

- As noted above, CEC's Solar for All program is expected to provide \$25 million in grants for residential solar (single- and multi-family), community solar, and associated energy storage systems. The grants must benefit low-income and disadvantaged communities and California Native American tribal residents located in publicly owned utility (POU) territories. Funding must be disbursed by May 2029. What are examples of existing or planned projects/programs that can utilize these funds by the deadline? If possible, provide solar nameplate capacities (kW or MW) or storage nameplate capacities (kWh or MWh).
- 2. What is the range of costs that are common for residential solar (single- and multi-family), community solar, or associated energy storage systems that serve low-income and disadvantaged communities? This could be expressed as total installed cost or \$/kW installed cost, along with describing the associated solar/storage nameplate capacities.

Please specify if the information provided is California-based and, if not, what region it is based on.

- 3. Given the CEC's Solar for All program has \$25 million to award, what program funding allocation structure would be most effective in supporting access to solar and storage for the targeted LIDAC communities and California Native American tribes?
  - a. Competitive solicitation. Eligible program participants submit applications for a competitive grant funding opportunity where applications are evaluated and scored based on criteria pre-specified in the solicitation and the highest scoring applications are awarded.
  - b. First-come, first-served application period. Applications are selected based on passing minimum criteria and funding is awarded based on submittal order until exhausted.
  - c. Segmented funding. Total funding is divided into separate or segmented funding pools based on applicant type (e.g., large POUs, small POUs, California Native American tribes, or some other recommended basis). Grants in each segmented funding pool can be awarded to eligible applicants within that pool using either a competitive or first-come, first-served process as described above.
- 4. The primary goals of the Solar for All program are to deliver savings to LIDAC and tribal communities and reduce greenhouse gas emissions (GHG). What should the program prioritize for disbursing awards to help achieve the primary goals? For example, maximize solar megawatt (MW)/\$, promote resiliency, or strive for proportional funding distribution?
- 5. Should CEC's Solar for All program be required to ensure that distributed solar deployment is incremental to California Energy Code requirements so that the program avoids subsidizing the cost of meeting existing code?
- 6. What level of match funding should an applicant be expected to contribute towards the total project cost (e.g. 0%, 10%, 20%, 30%, or higher), with the remaining portion funded by CEC's Solar for All program?
- 7. Which applicant types should the program work with to maximize deployment/benefits at the lowest cost (including program administration, compliance, etc.)? For example, applicant types could be POUs and tribes, project developers, third-party program administrators, or a mix.
- 8. As initially defined by US EPA, LIDAC eligibility will be based on census tract-level data, properties providing affordable housing, and geographically dispersed low-income households that meet area median income (AMI) or Federal Poverty Level thresholds. In cases where household income is used to meet eligibility, what documentation should be required? What are best practices for verifying eligibility for low-income utility programs?

- 9. What are best practices for conducting outreach to LIDAC communities and/or California Native American tribes? How can Community-Based Organizations (CBOs) best assist with outreach?
- 10. Are there challenges or needs that are particular to LIDAC communities or California Native American tribes that CEC should consider to inform program design and structure?
- 11. What types of technical assistance would help support successful projects benefitting rural, tribal, and other communities that experience access barriers?
- 12. Certain projects under the Solar for All award will be subject to "Build America, Buy America" domestic sourcing requirements for iron and steel, manufactured products, and construction materials. What, if any, barriers may this cause? How can those barriers be mitigated and addressed?
- 13. Is there other information or topics the CEC should consider regarding program design and structure that haven't been covered in the previous questions?

# (2) Benefits

- 14. As a condition of receiving funding from CEC's Solar for All program, awardees must deliver a minimum 20% average household electricity bill savings to all LIDAC households served under the program, including households in master-metered, multi-family buildings.
  - a. What are effective mechanisms to apply bill savings that do not affect resident income levels and ensure residents' eligibility for other low-income programs is unaffected?
  - b. Should the bill savings calculation be based on an average monthly or annual percentage of a customer's electrical usage?
  - c. What are best practices to ensure households that do not receive individual electricity bills (e.g. master-metered, multi-family buildings) receive the savings?
  - d. How should bill savings be verified? By whom and when?
- 15. As initially defined by US EPA, community solar funded by the CEC Solar for All program must meet the following definition: 1) nameplate capacity of 5 MW<sub>AC</sub> or less, 2) deliver at least 50% of the electricity generated from the system to multiple residential customers within the same utility territory as the facility, and 3) verify that at least 50% of the benefits and/or credits of the power generated from a community solar system be delivered to residential customers in the same service territory.
  - a. How do existing POU community solar projects verify delivery of benefits and/or credits to residential customers?
  - b. What verification processes for benefits and/or credits should be used for the CEC Solar for All program?

16. What process should be used to ensure community solar bill discounts are linked with the customer even if the customer moves to a new location within the same service territory?

#### (3) Siting, Permitting, and Interconnection

- 17. What tools, processes, or best practices should CEC require/encourage to streamline permitting and interconnection of solar and storage, and community solar projects? Are there technical assistance tools or examples of existing programs that can be leveraged?
- 18. Should CEC's Solar for All program require energy storage with solar development? What are potential impacts of energy storage on solar project development in terms of cost, timeline, permitting, or other factors?
- 19. How can a community solar development be structured to support resiliency by delivering energy to benefitting residents during grid outages?

### (4) Consumer Protection

- 20. What existing consumer protections are currently provided by residential solar, community solar, and energy storage programs?
- 21. How should the CEC Solar for All program incorporate consumer protection requirements? Are there consumer protection considerations particular to different housing types such as multi-family or single-family rental properties, or for LIDAC communities, that CEC should consider?

## (5) Quality Jobs

- 22. How can awardees support high-quality jobs for solar and energy storage projects that promote prevailing wage and training opportunities such as apprenticeship programs? What other workforce development, education, and training opportunities are available that should be required/encouraged by CEC's Solar for All program?
- 23. What are best practices for estimating or reporting on the job opportunities for solar and energy storage projects that should be incorporated in CEC's Solar for All program?
- 24. Are there examples of existing community investment plans or agreements that include High Road principles, (e.g. Project Labor Agreements, training trust fund contributions, local hire commitments, Disadvantaged Community hiring targets, regional living wage standards)? If so, please describe how CEC can best support.
- 25. What other workforce criteria should be considered as part of the CEC Solar for All program?

#### Submitting Comments to the CEC Docket.

Written comments must be submitted to the Docket Unit by 5:00 p.m. on February 28, 2025. Written comments, attachments, and associated contact information (including address, phone number, and email address) will become part of the public record via any internet search engine. Written comments may also be submitted by email. Include docket number 25-SOLAR-01 and CEC Solar for All Program in the subject line and email to <u>docket@energy.ca.gov</u>.

The CEC encourages the use of its electronic commenting system. Visit the e-commenting page for this docket <u>https://efiling.energy.ca.gov/EComment/ECommentSelectProceeding.aspx</u>. Enter your contact information and a subject title that describes your comment. Comments may be included in the "Comment Text" box or attached as a downloadable, searchable document in Microsoft® Word or Adobe® Acrobat®. The maximum file size allowed is 10 MB.

Additionally, a paper copy may be mailed to:

California Energy Commission Docket Unit, MS-4 Docket No. 25-SOLAR-01 715 P Street Sacramento, California 95814

**Public Advisor.** The CEC's Public Advisor assists the public with participation in CEC proceedings. To request assistance, interpreting services, or reasonable modifications and accommodations, call (916) 957-7910 or email <u>publicadvisor@energy.ca.gov</u> as soon as possible but at least five days in advance. The CEC will work diligently to meet all requests based on availability.

Media Inquiries. Email mediaoffice@energy.ca.gov.

**General and Technical Subject Inquiries.** Email <u>CAsolarforall@energy.ca.gov</u> or call (279) 226-1151.

**Availability of Documents:** Documents will be available at <a href="https://www.energy.ca.gov/programs-and-topics/programs/solar-all-program">https://www.energy.ca.gov/programs-and-topics/programs/solar-all-program</a>, or at <a href="https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-SOLAR-01">https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-SOLAR-01</a>.

When new information is posted, an email will be sent to those subscribed to the Solar for All Program topic. To receive these notices or notices of other email subscription topics, visit Subscriptions, at <u>https://www.energy.ca.gov/subscriptions</u>.

**Dated:** February 14th, 2025, at Sacramento, California.

Deana Carrillo

Deana Carrillo Director

Subscriptions: Solar for All Program