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Clean Power Research

March 14, 2025

California Energy Commission (CEC)
715 P Street, Sacramento, California 95814
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Re: CEC Solar For All Program Request for Information | Docket NO. 25-SOLAR-01

Dear CEC Solar for All program team,

Clean Power Research appreciates the opportunity to provide information as part of the CEC Solar for All program. We are pleased to share our perspectives on tools that could streamline and facilitate CEC's program to lower the energy burden by providing solar and storage options along with necessary upgrades that may be required.

Clean Power Research has served the energy and utility industry with software, research, and consulting services for over 25 years, with an emphasis on supporting the energy transformation and grid modernization with solutions for customer engagement and process automation. More than 75 utilities, energy agencies, and green banks across the United States—California's SOMAH Program, Connecticut Green Bank, Massachusetts's Department of Energy Resources MA SMART program, Oregon Department of Energy, Energy Trust of Oregon, SMUD, Southern California Edison, PacifiCorp, Liberty Utilities among others—actively use our cloud-based software solutions to address a wide range of challenges relating to distributed energy resources (DER) and beyond. Notably, our partner utilities and agencies collectively have processed more than 3 million customer applications for over 175 DER interconnection and incentives programs using our workflow automation software, PowerClerk®.

Through our experience as a trusted partner in the rapidly growing DER space, we offer the following observations when it comes to managing projects and their incentives:

1. An effective program minimizes stakeholder friction by offering a centralized portal to collect and process applications,
2. The software should be designed to screen eligibility and automate different tracks based on project needs,
3. The software should improve the accuracy and consistency of the data and offer robust reporting capabilities, and;
4. Utility's interconnection processes should provide transparency to accurately reflect its progress and enable the program to track the project status accurately.

We have elaborated on these points, and more, in our full responses to the RFI questions following this letter.

Our experience, proven software capabilities, and established data management processes put us in a unique position to develop best practices for quickly processing applications, reducing friction, and maximizing your impact. As a California company with offices in Napa, CA and Bellevue, WA, Clean Power Research would like to thank the CEC for the opportunity to share our perspectives on this matter. We look forward to answering any questions the Solar for All program team may have.

Sincerely,

*Alan Saunders*

Alan Saunders
VP of Sales and Business Development
Clean Power Research, L.L.C.

# Clean Power Research's Response to CEC Solar For All Program Request for Information Docket NO. 25-SOLAR-01

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## Topic Category (1) Program Structure

Question 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?

A best practice for verifying eligibility is offering a software that is designed to screen eligibility and offer feedback to applicants. As noted, this funding is required by the EPA to be utilized for LIDAC households, as defined by the EPA. Whether the CEC Solar for All program ("The Program") chooses to utilize the CEJST, EJScreen, or income verification against AMI individually or as a group, the chosen software should provide easy data collection, user security protections, and immediate eligibility feedback.

Question 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?

As the provider of a workflow automation solution, our perspectives are centered around how to best streamline and automate the intake/submission, review/revisions, and approval of these applications and managing the extensive dataset that results from these processes for reporting purposes. We recommend the following best practices and processes:

- An effective program minimizes stakeholder friction by offering a centralized portal to collect and process applications: A successful tool enables all stakeholders to interact with projects on a role-based level. Implementing a flexible software solution to support multiple programs (i.e., single family home and multi-family home) across different technologies (i.e., solar and storage) provides tremendous value to The Program team in terms of implementation resources, and ongoing maintenance needs, while streamlining user experience for applicants, installation contractors, and program managers. In particular, the ability to provide access to external users and internal users like coalition partners.
- The software should be designed to automate different tracks based on project needs: Some projects may require financial assistance, upgrades such as roof replacement, or other assistance. The Program should offer different paths based on the project's criteria to properly track and collect data from the appropriate projects while fast-tracking others. In particular, the ability to dynamically route projects through a workflow based on criteria such as project size, technology type, locational characteristics and results of technical screens should empower administrative staff to minimize churn and inefficiencies across multiple workflows that serve their community's DER interests.
- The software should improve accuracy and consistency of the data and offer robust reporting capabilities: Inconsistencies and errors found in data submitted by applicants are exceedingly common pain points associated with interconnection and incentive application processes. These issues frequently result in unnecessary delays due to the additional back and forth between program administrators and applicants for correction. Aside from educating customers and contractors on the best practices for filling out applications, the software solution should also be designed to prevent these situations. For example, providing standardized lists of equipment with drop-down selections helps eliminate guesswork on the applicant's part. The solution could offer real-time feedback to the application. The data infrastructure should be set-up to quickly create and update reports mandated by the EPA or other state entities, leaving a hassle-free experience for data analysts.

## Topic Category (2) Benefits

### Question 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.

We believe a best practice is to initially project bill savings when reviewing the initial application to ensure that the system will likely deliver a minimum 20% average household electricity bill savings. This can be accomplished by providing a calculation that considers the current energy usage, the proposed system's estimated annual production, and the utility bill rate. By screening for projected

savings, this can assist The Program with identifying projects that intend to meet this threshold. CPR does not have further comments on this question.

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

### Question 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?

Through our experience as a trusted partner for both utilities and energy agencies, we encourage the CEC to suggest utilities approving interconnection of solar & storage projects adopt a centralized platform for intake that provides transparency throughout the process and enables The Program or the applicant to keep the Solar for All project status up-to-date. For example, the SOMAH program is hosted in our platform, PowerClerk, along with three of the five utilities it serves (Liberty Utilities, PacifiCorp, and Southern California Edison). The SOMAH program leverages the Channels feature that allows the SOMAH project to connect with the utility's interconnection project during the prescreen phase. PowerClerk can also connect to other systems through the API or SFTP processes.