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CEC Solar For All Program Request for Information

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PREPARED FOR

California Energy Commission

SUBMITTED BY

Center for Sustainable Energy

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Contents

I. QUESTIONS

Program Structure

1. WHAT ARE EXAMPLES OF EXISTING OR PLANNED PROJECTS/PROGRAMS THAT CAN UTILIZE THESE FUNDS BY THE DEADLINE?

The CEC's Solar for All funding needs to be in compliance with EPA requirements and goals. Program design must also address any unique components to POU regulations as well as LIDAC and tribal implementation challenges and barriers. However, generally, California has multiple existing and past programs from which the CEC's Solar for All programs can build. For example, CSE implements programs to coordinate solar and storage in multiple utility territories for single-family, multi-family, LIDAC and tribal communities. To ensure that the highest percentage of the CEC's $25 million allocation reaches the intended participants, CSE supports an implementation approach that prioritizes building upon the vast expertise and programmatic history of existing California programs while also working to simplify and streamline program rules and requirements (to the degree that is possible). Some existing programs that serve LIDAC and tribal customers that can provide lessons learned to guide the development of the CEC Solar for All program are the following:

- Solar on Multifamily Affordable Housing (SOMAH)
- San Diego Solar Equity Program (SDSEP)
- Self Generation Incentive Program (SGIP)'s Residential Solar and Storage Equity (RSSE) Budget

2. WHAT RANGE OF COSTS ARE COMMON FOR RESIDENTIAL SOLAR (SINGLE-FAMILY AND MULTIFAMILY), COMMUNITY SOLAR OR ASSOCIATED STORAGE SYSTEMS SERVING LIDAC CUSTOMERS?

On single-family residential homes, CSE's experience and existing data from the California Self-Generation Incentive Program (SGIP) shows that incentive rates of $1.10/Wh for storage roughly covers the full cost of storage technologies. Recently, the incentive rate for residential equity projects was updated from $0.85/Wh to $1.10/Wh per D. 24-03-071 to cover the full cost of the storage system for equity residential customers in most cases. The Decision noted that the 2021 SGIP Marketing and Evaluation report by the evaluator found that the average total eligible costs for a storage system ranged between $0.98/Wh to $1.11/Wh.

In the San Diego Solar Equity Program (SDSEP), the solar incentive is set at $4/W. This incentive rate was selected with the goal of fully covering the cost of the system for the program's income-qualifying customers. For the multifamily sector, the Solar on Multifamily Affordable Housing (SOMAH) program demonstrates that multifamily solar costs per watt on individually metered multifamily housing trend slightly higher than single-family solar, at an average of about $4.30/W.

An additional trend to note is that, per statistics from single-family electrochemical storage systems in SGIP, the cost per watt decreases as the system size increases. Per data available at californiadgstats.ca.gov, systems greater

than 10 kW have lower average costs per watt than systems less than 10 kW. In 2024, the cost per watt for storage projects less than 10 kW was $5.79/W, and the cost per watt for storage projects greater than 10 kW was $4.42/W.

It is also important to consider that there are additional costs associated with preparing a home or multifamily building to receive solar installations, such as electrical panel upgrades and roof repairs. In SDSEP, applicants can claim up to an additional $3,500 per project for service panel and wiring upgrades. This additional incentive amount in the SDSEP was modelled off the $2,800 and $3,600 electrical panel upgrade adders included in the SGIP Heat Pump Water Heater (HPWH) program design for general market and equity residential customers respectively. In the DAC-SASH 2024 Marketing, Education and Outreach Plan, GRID Alternatives reported that in 2023 the most common reason for pre-qualified lead deactivation was that the home was not suitable for solar due to old or unsafe roof conditions. The next most common reason was electric panel capacity.

3. WHAT FUNDING ALLOCATION STRUCTURE WOULD BE MOST EFFECTIVE IN SUPPORTING ACCESS TO SOLAR AND STORAGE FOR LIDAC CUSTOMERS AND CALIFORNIA NATIVE AMERICAN TRIBES?

CSE recommends segmented budgets. Separate budgets are needed to more equitably distribute program funds between LIDAC and California Native American Tribe customers. There could be several ways to create a methodology to implement this division of funds. The CEC could establish fund distribution based on each POU or Tribe's share of total electric sales in California, which has been a methodology used in past programs, including the California Solar Initiative. A similar example can be found in the SOMAH program, which provides incentives on a statewide basis while also accommodating budget splits for the participating IOUs. PG&E, SCE, SDG&E, Liberty Utilities and PacifiCorp all fund the SOMAH program from their proportionate shares of greenhouse gas (GHG) allowance sale proceeds. To ensure incentives collected by each IOU are set aside for their respective deed-restricted multifamily affordable customers, CSE created unique programs within our application software that ensures funds applied for in one territory are accounted for from that utility's pot of GHG allowance sale proceeds funding. This program structure could be replicated for the POU S4A with a logical process flow that leads applicants to the right program when applying for funding.

4. 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?

Achieving solar installation, resiliency and equitable fund distribution are all critical goals. However, the most important focus should be to ensure the program results in solar (and storage, if applicable) installs for as many program participants as possible. This can only be achieved by prioritizing program simplicity. If program simplicity is front and center to all program design considerations, then other goals (MW, resiliency, equitable distribution) will be more easily achieved. Residents in LIDAC and tribal communities face a number of challenges to participation in clean energy rebate programs: financial costs, lack of time to manage the process, and lack of awareness, understanding and trust. Thus, it is critical to offer an accessible program that is designed with easy-to-understand rules that are not a barrier to participation. Depending on the customer segment, they may or may not be acting as the applicant for their award/incentive application. Clear eligibility requirements aligned with the intended program offering are also important so that the intended customers can participate without undue administrative burden. Rather than prioritizing the three elements presented in this question, we suggest paying

the full amount of the system cost (to ensure participation), with pricing structured around an assessment of current technology costs (with a potential for increased costs due to likely tariffs on steel, etc.), via a methodology (described briefly above) for funds distribution across different segments.

5. SHOULD THE PROGRAM ENSURE THAT DISTRIBUTED SOLAR DEPLOYMENT IS INCREMENTAL TO CA ENERGY CODE REQUIREMENTS TO AVOID SUBSIDIZING THE COST OF MEETING EXISTING CODE?

Historically, LIDAC and tribal residents have not participated in clean energy programs to the same degree as market rate residents. As mentioned above, there are many reasons for this. A key one, however, is the project cost. If the goal of this program is to address the pervasive gap in program participation, then the CEC's Solar for All funding should not ensure or require that solar deployment be incremental to the CA Energy Code. (Note: this is not to say that CSE does not recognize the critical value of code improvements – indeed, building energy codes are a key policy lever). In sum, the program should help customers cover the cost of solar and storage installation regardless of the recent shift in CA codes that have mandated solar deployment.

6. WHAT LEVEL OF MATCH FUNDING SHOULD THE APPLICANT BE EXPECTED TO CONTRIBUTE TOWARDS THE TOTAL PROJECT COST WITH THE REMAINING PORTION FUNDED BY CEC S4A?

The CEC S4A should not expect the applicant to contribute any match funding and should instead set the incentive amount/rate to cover the full cost of the system(s) installed. For low-income residential homeowners, purchasing an energy storage and/or solar system is often regarded as a lower, secondary priority due to limited disposable income, although it would help a household's finances in the form of utility bill savings. CSE proposes low-income incentives cover the full cost of the solar and/or energy storage system. This is to ensure that cost is no longer a barrier to participation for low-income customers.

7. WHICH APPLICANT TYPES SHOULD THE PROGRAM WORK WITH TO MAXIMIZE DEPLOYMENT/BENEFITS AT LOWEST COST? (I.E. POUS, TRIBES, DEVELOPERS, THIRD-PARTY PROGRAM ADMINISTRATORS, ETC.)

The CEC should work with all of these stakeholders to ensure program success. However, swift action is essential to making the most of Solar for All funding. With multiple competing priorities and concerns consuming government agencies' time and resources, an experienced third-party program administrator (PA) can provide a turnkey yet customizable solution that efficiently meets program goals and objectives and serves community needs. Furthermore, designing and implementing clean energy incentive programs is not the core focus or expertise for any of these entities (POUs, tribes, developers). Given that this program will have funding available for less than four years, it is most efficient to identify entities that already have this expertise.

Under Solar for All grant guidelines, successful applicants will need a competitive request for proposal process to select a third-party PA.

Third-party PA program benefits:

- **Expertise and experience**: A PA with knowledge of similar, pioneering solar and energy storage equity programs allows your program to take advantage of lessons learned.
- **Resources:** A PA can deploy a broad team experienced in program design, marketing and outreach, secure online application portals, customer service and technical assistance, incentive processing, and data tracking and reporting.
- **Cost- and time-saving efficiencies:** An experienced PA can offer a turnkey program design and administration solution that will streamline and speed up program launch.
- **Community partnership:** A nonprofit PA experienced in partnering with community-based organizations ensures programs are community- and equity-centered from the start.

CSE recommends the CEC consider selecting a single statewide Program Administrator to lead the design and implementation of CEC S4A in the POU service territories. Speed, efficiency, and streamlined participation should be the ethos of this new funding. Creating unique and individual programs for all 47 POUs in California would significantly slow implementation and program launch. Moreover, having 47 unique programs with identical rules means the program could be administered in potentially 47 different ways. For example, application queueing, application processing, and program communication (virtual and live) could all be done differently, meaning developers working across utility service territories would need to understand how best to engage in potentially 47 different ways, decreasing the opportunity to reduce soft costs which, in turn, are passed on to customers. Additionally, considering the small size of some of the existing 47 POUs, where perhaps only a small number of applications would be submitted, it does not make sense to create a program that requires a base level of cost to set up and administer. Rather, requiring a single entity to administer the program on behalf of the POUs statewide will create consistency for program participants and provide cost-effective program implementation.

8. WHAT DOCUMENTATION SHOULD BE USED FOR INCOME VERIFICATION? WHAT ARE BEST PRACTICES FOR VERIFYING ELIGIBILITY FOR LOW-INCOME UTILITY PROGRAMS?

CSE suggests a self-verification process where the program administrator would review income verification on a sample basis. Self-attestation is the most efficient and least burdensome way for low-income customers to demonstrate income eligibility. In order to safeguard against any potential fraud, the program should put in place a strict penalty of perjury clause aimed at both customers and their contractors/developers that could lead to clawback of funding via a legal route, removal from the program, and up to and including license revocation, working in conjunction with the Commission's consumer protection rules and the Contractors State License Board (CSLB).

Furthermore, to simplify the application process, determine eligibility, and create a deterrent to fraud, CSE suggests a self-attestation process where the program would review income verification on a sample basis that is not tied to the number of applications submitted by developers. Self-attestation is a proven method to ensure compliance while allowing the processing of applications and payment of incentives to be streamlined. This approach was used in the management of the Clean Vehicle Rebate Project (CVRP), implemented by CSE under the auspices of the California Air Resources Board (CARB), one of California's largest and longest running incentive programs.

However, if the self-attestation process is not adopted in the program design, our secondary recommendation is to align with an income-qualified program that has components, including categorical eligibility, that allow for easier

customer enrollment. If self-attestation is incorporated into the program, it is still extremely valuable to have alignment across other income-qualified programs. This allows for program stacking and co-leveraging, where appropriate, and can create a successful pathway for co-marketing and referrals as well.

The receipt of current tax returns, pay checks, or income statements is the most practical way for proof of eligibility, but gathering these documents comes with several difficulties and typically increases program administration costs. First, the effort expended by prospective low-income customers to track this information down can be burdensome and a non-starter. Second, there is considerable sensitivity in sharing this type of Personally Identifiable Information (PII). Moreover, some customers may not file tax returns or have a typical paycheck, making the ability to collect this information a challenge.

CSE's recommendation to help ease the income eligibility requirements for participation would be to align with the investor-owned utilities' (IOUs') California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs, which offer applicants the opportunity to show proof of participating in one of the following assistance programs:

- Bureau of Indian Affairs General Assistance
- CalFresh (Food Stamps) / Supplemental Nutrition Assistance Program (SNAP)
- CalWORKs (Temporary Assistance for Needy Families; TANF) or Tribal TANF
- Head Start Income Eligible (Tribal Only)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Medicaid/Medi-Cal
- Healthy Families A & B
- National School Lunch Program (NSLP)
- Supplemental Security Income (SSI)
- Women, Infants and Children (WIC)
- CARE/Family Electric Rate Assistance (FERA) Program

9. WHAT ARE BEST PRACTICES FOR OUTREACH TO LIDAC AND TRIBAL COMMUNITIES? HOW CAN COMMUNITY-BASED ORGANIZATIONS (CBOS) ASSIST WITH OUTREACH?
10. ARE THERE CHALLENGES OR NEEDS PARTICULAR TO LIDACS OR TRIBES THAT CEC NEEDS TO CONSIDER IN PROGRAM DESIGN?

A program administrator experienced in both solar (+storage) equity program administration and marketing, education and outreach (ME&O) to equity communities can seamlessly bridge communication gaps to raise awareness of Solar for All programs and make it easier to apply. When engaging a hard-to-reach audience, incentives do not sell themselves. A detailed ME&O plan, informed by local stakeholders in each of these communities which should include community-based organizations, neighborhood councils, and local leaders from the communities and should assist to inform outline strategies for raising awareness and encouraging participation. Community stakeholders understand the issues, concerns and barriers for this communities and can provide valuable insight.

In addition to a comprehensive Program Handbook, CSE recommends the program develop an easy-to-navigate program website tailored to meet the needs of multiple participants, including property owners, contractors,

tenants and job seekers that can serve as a central landing page for the program. This program hub should host a variety of educational collateral materials and factsheets, checklists, how-to videos and maps as highlighted throughout the resource-rich SOMAH website. To further transparency and bolster program resources CSE created an online Eligible Property Map for SOMAH that can be filtered by disadvantaged community status, utility service territory and legislative district to make it easy for property owners to see if they qualify, for contractors to find potential customers and for the public to see the program's reach.

CSE recognizes the vital role of funded CBO partners in effectively reaching and supporting our underserved communities. CBOs partners help ensure that the needs and challenges of our impacted communities are reflected in program design while raising awareness of available benefits. As trusted voices, CBOs share information with community members in ways that resonate and foster engagement and action. By providing CBOs with guidance and resources and actively listening to thier insights, CSE has built lasting a lasting community partner network that continues to drive clean technology adoption beyond the lifespan of individual programs. The success of Solar for All will depend on continuous, collaborative, transparent two-way communication with LIDAC and tribal communities.

Best practices for Program Design and Implementation

- **Seek an experienced program administrator** aligned with an equity mission and CBO partner expertise.
- **Incorporate compensation for CBOs** into program budgets to fund their expertise informing program design and implementation and for conducting outreach to potential program applicants, contractors, community solar subscribers and job trainees and apprentices.
- **Consider having a paid advisory council** that represents environmental justice, affordable housing, tenants, labor and workforce development, tribal communities and government.

4 Ways Policymakers Can Compensate CBOs for Their Expertise

Additionally, the POU S4A program could reserve a portion of the administrative budget for cultural competency and tribal relations training to prepare the PA team for outreach and engagement with tribal customers. Providing additional administrative and technical assistance support to potential tribal customers can help build capacity and move applicants through the program. Additionally, including a tribal consultant during program design development could help ensure the perspective of tribal customers is represented in the final program design.

11. WHAT TA WOULD HELP SUPPORT SUCCESSFUL PROJECTS?

The complexities of lining up financing (if required), choosing a contractor and applying for rebates can dissuade customers from even considering solar. That is why a Solar for All program should help customers understand the benefits of installing solar and explain the process before they are required to invest. In CSE's experience, technical assistance services, including cost/benefit analyses, assessment of a property's solar viability and identification of cost-effective energy efficiency upgrades, reduce the resources a customer needs to expend to adopt solar.

Best practices for providing technical support to projects:

- **Provide no-cost technical assistance** to help property owners understand the benefits of solar and the program application process.

- **Ensure you have a technical assistance team** that fully understands the program and the concerns of property owners and contractors.
- **Proactively connect with prospective applicants** who have expressed interest but haven't applied to see if technical assistance is the missing link to get them to participate.

Technical assistance can span a wide range of topics.

It's important to meet potential participants and communities where they are and recognize the value of TA both early on and through the life of the project, even into post installation. Assessing project feasibility, installation considerations, and/or ownership options are examples of decisions that can be overwhelming and burdensome to customers, especially for LIDAC customers. Thus, TA can range from supporting customers in finding a contractor and supporting bid solicitation to identifying opportunities and co-leveraging clean energy programs.

12. WHAT, IF ANY, BARRIERS MAY BABA REQUIREMENTS CAUSE? HOW CAN THESE BE MITIGATED AND ADDRESSED?

Generally, increased requirements increase cost, and BABA is no different. BABA will likely increase costs as it relates to program set up (ensuring compliance structures are accurately designed and implemented), program compliance (QAQC to ensure the requirements are being adhered to), as well as to project costs (e.g. higher labor costs in the US as compared to other countries). However, given the uncertainty in the overall marketplace (e.g. related to tariffs and potential cost/availability of steel, etc.), it is challenging to provide further comments with specific barriers and impacts at this time. Ultimately, the CEC will need to be prepared to develop a program design that can be flexible and adaptable in response to unforeseen complications as the circumstances evolve.

13. IS THERE INFORMATION OR TOPICS NOT COVERED IN THESE QUESTIONS THAT SHOULD BE CONSIDERED IN PROGRAM DESIGN?

Not answered.

Benefits

14. AWARDEES MUST DELIVER 20% AVERAGE HOUSEHOLD BILL SAVINGS TO ALL LIDAC HOUSEHOLDS SERVED – WHAT ARE EFFECTIVE MECHANISMS TO APPLY BILL SAVINGS? SHOULD BILL SAVINGS CALCULATIONS BE BASED ON AVERAGE MONTHLY OR ANNUAL PERCENTAGE OF A CUSTOMER'S ELECTRICITY USE? WHAT ARE BEST PRACTICES TO ENSURE HOUSEHOLDS RECEIVE THE SAVINGS? HOW SHOULD BILL SAVINGS BE VERIFIED?

The bill savings calculations should be based on the average monthly customer electricity use to ensure that the bill savings support is consistently proportional with the energy burden in each month.

For multifamily solar installations, the program design should include provisions to ensure tenant households are receiving the benefits of the solar installation and are not penalized for the added value to the building. For example, the SOMAH program, limited to multifamily properties with individually metered units, includes the following guidelines:

- A minimum of 51% of the system's production must directly offset tenant load and be provided to tenants in the form of virtual net energy metering (VNEM) bill credits to ensure tenant benefit
- 100% of the economic credit through VNEM goes to reducing tenant electric bills for the life of the system or 20 years, whichever is less
- Participating property owners are required to exclude solar credits from utility allowance calculations, cannot raise rent in relation to the SOMAH-funded PV installation or assume control of the tenant utility accounts

15. HOW DO EXISTING POU COMMUNITY SOLAR PROJECTS VERIFY DELIVERY OF BENEFITS/CREDITS TO CUSTOMERS? WHAT VERIFICATION PROCESSES SHOULD BE USED?

Not answered.

16. WHAT PROCESS SHOULD BE USED TO ENSURE COMMUNITY SOLAR BILL DISCOUNTS ARE LINKED WITH THE CUSTOMER EVEN IF THEY MOVE TO A NEW LOCATION IN THE SAME SERVICE TERRITORY?

If the system is entirely paid for by the program, then the critical question is whether the new resident (or tenant) meets the program requirements (e.g. LIDAC/tribal community). It may not matter, necessarily, that the savings follow the participant to their new location. However, if the CEC chooses to require that the participant pay for a portion of the project, then it does matter. In this case, the CEC could consider using either an opt in or opt out notification process for transfer of service within the same territory.

Siting, permitting and interconnection

17. WHAT TOOLS/BEST PRACTICES SHOULD CEC REQUIRE TO STREAMLINE PERMITTING AND INTERCONNECTION? ARE THERE TA TOOLS OR EXISTING PROGRAM EXAMPLES THAT CAN BE LEVERAGED?

The timeframe of fund disbursement identified by the CEC in the RFI is January 2026 – May 2029. This 42-month time frame effectively means that there will be ~24 months for more complicated projects (e.g. multi-family and community solar) to be completed. CSE bases this assumption off of our experience implementing the SOMAH program. For SOMAH, a typical timeframe for installation and permitting is 18 months – however, many projects request extensions, often due to interconnection timelines.Twenty-four months for more complex projects (multi-family and community solar) - including program start up tasks such as marketing and recruiting participants – is tight. Thus, it could be helpful if the CEC used this program as an opportunity to collate information regarding interconnection processes, challenges and opportunities across the POUs (or have the third-party PA do this) to identify ways to streamline permitting and interconnection processes. Finally, we strongly support the CEC encouraging the use of available software tools like SolarAPP+ to standardize and streamline the permitting process for rooftop solar systems.

18. SHOULD CEC S4A REQUIRE STORAGE WITH SOLAR? WHAT IMPACTS WOULD INCLUSION OF STORAGE HAVE ON COST, TIMELINE, PERMITTING?

The CEC S4A should not necessarily require energy storage with solar installations as doing so would increase the project costs and complexity. However, incorporation of storage should be encouraged if resiliency is determined to be a target outcome of the CEC S4A. To promote resiliency, the program could consider making it a priority for selecting projects or issuing a higher incentive for projects with solar paired with battery storage.

19. HOW CAN COMMUNITY SOLAR DEVELOPMENT BE STRUCTURED TO SUPPORT RESILIENCY BY DELIVERING ENERGY TO CUSTOMERS DURING AN OUTAGE?

As the CEC is aware, generally, solar can be combined with storage to increase resiliency. With off-site community solar, this becomes more challenging and complex (though not impossible) to achieve. While CSE certainly supports the goal to increase resiliency for LIDAC and tribal participants, as mentioned previously, providing these technologies to these participants is uniquely challenging. Given the timeframe for program roll out, we would suggest not further complicating the program design at this stage, and rather build upon lessons learned from the activities underway in programs such as the CPUCs SGIP.

Consumer Protection

20. WHAT EXISTING CONSUMER PROTECTIONS ARE CURRENTLY PROVIDED IN EXISTING PROGRAMS?
21. HOW SHOULD CEC INCORPORATE CONSUMER PROTECTION REQUIREMENTS, AND DO THEY VARY BASED ON MULTIFAMILY, SINGLE-FAMILY, ETC?

SOMAH's comprehensive technical assistance is designed to promote market development while ensuring broad consumer protections are in place. The SOMAH program also emphasizes a zero-tolerance approach for providing false or misleading representations about SOMAH and solar energy, especially the financial value proposition, which is an important consumer protection issue in California's solar industry. For SOMAH, all solar providers must comply with all applicable laws and regulations, including requirements around California Public Utilities Commission's (CPUC) Solar Consumer Protection Guide. The CPUC recommends that solar providers present this guide during their first contact with potential customers. While the focus of this resource is single-family homeowners considering a solar energy system for their home, much of its content is also relevant for potential multifamily affordable housing property owners. SOMAH participants are encouraged to review the guide carefully to ensure accurate communication about solar energy and its benefits.

In SDSEP, the program leverages a list of approved solar contractors to install projects under the program. These contractors must attend annual program trainings and hold active Contractors State Licensing Board (CSLB) licenses. Additionally, customers are provided with guidance which includes best practices such as receiving bids from at least three contractors before selecting and including language in the contract that allows the customer to break the contract if funding for the solar project is not approved by SDSEP.

Finally, CSE has found that our close work with CBOs can yield additional findings and feedback about effective ways to establish consumer protection requirements, and to ensure that participants are receiving the anticipated savings and program experience.

Quality jobs

22. HOW CAN AWARDEES SUPPORT HIGH-QUALITY JOBS AND PROMOTE PREVAILING WAGE AND TRAINING OPPORTUNITIES? WHAT WORKFORCE DEVELOPMENT AND EDUCATION OPPORTUNITIES ARE AVAILABLE THAT SHOULD BE INCLUDED IN CEC S4A?

The CEC S4A program requirements should be developed to include provisions around job training and workforce development.

Providing local economic benefits through job training opportunities is a key intent within SOMAH. The program includes robust job training and local hiring components to further the benefits provided to the communities in which solar systems are installed. For example, per the SOMAH Handbook Section 2.6, Solar Contractors on each SOMAH project agree to hire eligible workforce trainees, with the number of trainees and required hours varying based on the system size.

23. WHAT ARE BEST PRACTICES FOR ESTIMATING/REPORTING ON JOB OPPORTUNITIES?

If the CEC S4A intends to estimate or report on the job opportunities, it is important for job training requirements to be integrated into the program design. With job training requirements, specific data collection points can be established to ensure all participating contractors are tracking and reporting job data to the Program Administrator.

For example, in the SOMAH program, participating solar contractors are required to submit a Job Training Affidavit that includes the names of eligible job training programs and job trainees used for each SOMAH installation.

Otherwise, the CEC S4A can take a more passive approach and instead collect this information in a post-participation survey to understand the workforce used on each project. SOMAH also requires Solar Contractors to respond to job training surveys for a minimum of 1 year after the project completion date.

24. ARE THERE EXAMPLES OF EXISTING COMMUNITY INVESTMENT PLANS OR AGREEMENTS?

Not answered.

25. WHAT OTHER WORKFORCE CRITERIA SHOULD BE CONSIDERED?

Not answered.