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Response to Request for Comments re AB 523

Groundwork San Diego, a recipient of CEC Epic Phase I funding, offers the following comments:

1. The Epic invoice payment process, including long waits, uncertain payment timelines, and uncertain retention release timelines, is burdensome to CBOs and the DBEs they seek to engage as subconsultants. An advance payment process, such as enabled for DWR by AB 2064, is recommended.
2. Government/IOU services and offerings to DACs are uncoordinated and therefore often inaccessible or confusing to residents. Grant applicants could be incentivized through bonus points or some other mechanism to coordinate, through MOUs or some other process, with other community-based organizations.
3. The requirement, in the current Epic Phase II RFP, that all project activities be deployed in a DAC, precludes the location of renewable generation in a contiguous, but non-DAC census tract. In the case of the Groundwork San Diego project, that non-DAC but low income census tract serves as the commercial hub for the adjacent DACs and would bring DAC residents multiple benefits as a generation site.