

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-SOLAR-01
<b>Project Title:</b>	California Automated Permit Processing Program (CalAPP)
<b>TN #:</b>	241607
<b>Document Title:</b>	City of Manteca's Comments on Staff Workshop CalAPP Program
<b>Description:</b>	N/A
<b>Filer:</b>	Chester Hong
<b>Organization:</b>	City of Manteca/Brad Wungluck
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	2/22/2022 12:10:19 PM
<b>Docketed Date:</b>	2/22/2022

**From:** [Wungluck, Brad](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 21-SOLAR-01 and Staff Workshop CalAPP Program  
**Date:** Tuesday, February 22, 2022 12:03:13 PM  
**Attachments:** [image001.png](#)

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

First, as a local government Building Official, I have several concerns regarding the capability to incorporate SolarAPP, permit data, fee information, etc. into an existing software system. Without that consistent and accurate transfer of information between the two the efficiencies described in permitting will only benefit solar installers and cause a significant burden on staff and delays in other permit types due to the manual work that will be triggered by the program. However, I understand that comments are being requested from the Energy Commission specifically on the grant opportunities at this time and my hope is that those opportunities will help alleviate some of the issues that will be created for local jurisdictions. Please see my comments below.

1. *Energy Commission staff are aware of one tool, SolarAPP+, this is available for the specific purpose of this funding program and anticipate municipalities will primarily adopt SolarAPP+ as their automated, online permitting solution. Are there other solutions including custom IT development that should be supported by this funding program?* SolarAPP should not be the only program specified by the funding program. Due to the opportunities for jurisdictions and their current software vendors to create similar programs that achieve similar results, I believe limiting jurisdictions to SolarAPP will create a greater burden on adoption and expense.
  - a. *What is needed for your jurisdiction to make the decision to adopt SolarAPP+?* At this time we are unable to adopt SolarAPP because of it's inability to actively communicate and transfer information from the app to our permitting software. Therefore, we do not have the data necessary for the legally required document retention, permit records, fee information, etc.
  - b. *What is the likelihood that you would choose to implement a different solution than SolarAPP+?* I don't have a preference either way nor could I discuss that likelihood. I believe that I would make the decision that has the least impact on the department and has the best opportunity to integrate into our permitting software.
2. *What does the process to implement SolarAPP+ or another automated permitting solution include?* The process to implement SolarApp or any other permitting solution is significant. It requires creating a team from multiple departments (Community Development, IT, Finance, City Attorney, City Manager, etc.) meeting to ensure that all departments needs are met and that the introduction of a new permitting solution is not creating unforeseen issues, concerns, or problems either legally or procedurally.
  - a. *Are there key decisions makers that must approve the use of a new system?* Yes, please see the group listed above.

- b. *What is the timeframe for approval and adoption of a new system?* The typical timeframe for approval and adoption of a new system is at least twelve months from beginning to end (including transition, training, implementation, testing, roll-out, etc.)
3. *The SolarAPP+ tool integrates with existing municipal automated permit processing software or alternatively can be used as a stand-alone tool.* That is not entirely true as it only integrates with some permitting software systems. Others are required to go stand-alone which requires significant staff time and resources to ensure the data and information being generated in SolarAPP is transitioned to other data repositories.
  - a. *Do you currently have an automated permit process?* Yes.
  - b. *If not, would you adopt SolarAPP+ as a stand-alone solution or seek to automate the permit process in addition to adopting the solar system permit validation provided by SolarAPP+?* N/A
4. *Application Process - Funding Levels: Please provide feedback on our proposed funding levels.* I believe the funding levels are sufficient; however, you should be aware that permitting software conversions to those that function with SolarAPP cost in excess of \$400,000 for most jurisdictions. Therefore, the ability to budget and acquire the funds necessary in the short time frame is extremely difficult especially since many budget process for FY2023 are already underway.
  - a. *Are the proposed funding amounts for your jurisdiction sufficient to cover costs associated with adopting SolarAPP+ or launching an online, automated solar permitting software and training both staff and affected permit applicants?* No, they are not. As mentioned the costs of an automated permitting software component for our City will cost in excess of \$400,000.
5. *Eligible Costs -Are the eligible costs proposed inclusive of all costs related to adopting an automated permitting system and training staff and affected parties in the use of the system?* My understanding of the proposed reimbursable costs is that it does not include any other software or permitting platform expenditures apart from staff costs. Unfortunately, the majority of the costs in assisting departments with converting to something like SolarAPP are in the software, subscription, and maintenance costs that are required to be paid prior to the ability to use the permitting software. It would be best if some of those expenses, or a percentage, since the conversion would be due to SolarAPP would be able to be included as eligible in some way.
  - a. *Are there other costs associated with automated solar permitting software that we did not propose as eligible?* I'm unaware but in order to add additional opportunities for other programs or for permit software options that better integrate with SolarAPP these software costs should be included as eligible.
6. *Typically, CEC grant programs only fund activities completed after a final grant agreement is approved, which for purposes of this program staff estimate to be no earlier than Fall 2022. Does this impact your plans to adopt an online automated solar permitting tool?* Yes, as we will be forced to wait until the Fall of 2022 to proceed as the funding is a large component of

how we will be able to move forward and which path we choose to utilize.

7. *Reimbursement model - CEC staff are proposing that payment will be made on a reimbursement basis after all activities are completed. Does this funding model meet jurisdictions' needs sufficiently to encourage and support adoption of an online automated permit platform? As this is typical with grant activities I do not foresee any issues at this time.*
  
8. *New homes permitting – Currently SolarAPP+ does not support permitting for new construction however NREL and its partners are working on this addition as well as permitting support for storage systems. Does this current limitation pose a barrier to adoption of the SolarAPP+ tool? No, I do not foresee any issues at this time.*



**Brad Wungluck – Deputy Director, MPA**

City of Manteca | Development Services Department  
1215 W. Center St. Suite 201 | Manteca, CA 95337  
Office: 209.456.8562

[www.mantecagov.com](http://www.mantecagov.com)