

DOCKETED	
Docket Number:	23-ERDD-01
Project Title:	Electric Program Investment Charge (EPIC)
TN #:	253769
Document Title:	PearlX Infrastructure, LLC Comments
Description:	N/A
Filer:	System
Organization:	PearlX Infrastructure, LLC
Submitter Role:	Public
Submission Date:	12/28/2023 5:08:35 PM
Docketed Date:	12/29/2023

*Comment Received From: PearlX Infrastructure, LLC
Submitted On: 12/28/2023
Docket Number: 23-ERDD-01*

PearlX Comments on 23-ERDD-01

Additional submitted attachment is included below.



Solar power and storage for multifamily properties

December 28, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 23-ERDD-01
715 P Street
Sacramento, CA 95814
Submitted via email to docket@energy.ca.gov

Re: Docket No. 23-ERDD-01, “Advancing the Environmental Sustainability of the Clean Energy Transition”

PearlX Infrastructure LLC (“PearlX”) respectfully submits these comments on the California Energy Commission’s (CEC) Funding to Advance the Environmental Sustainability of the Clean Energy Transition (Enviro-SET) to contribute to the implementation of the Electric Program Investment Charge (EPIC) 2021-2025 Investment Plan.

PearlX finances, develops, installs and manages clean energy amenities, such as solar generation and storage, on multi-family properties. Nearly half of Californians rent their homes, and most low-income renters live in multi-family housing. However, the rental and multi-family housing market has lagged far behind single-family homes in adopting solar and battery storage. This is because distributed energy resource (DER) incentives designed for single-family homes have not worked in the multi-family housing and rental markets, which are inhibited by the “split incentive problem.”

PearlX is one of the few developers that has developed a business model that offers a solution that is feasible and favorable to landlords and tenants. PearlX removes time and effort it would take for a landlord to develop and managing a solar and storage project, while also creating an additional revenue stream for the landlord. The landlord’s tenants have the option to subscribe to the solar and storage project, both lowering their energy costs and providing energy resiliency without raising rent.

PearlX specifically wishes to offer comments on Research Group 2: Assessing, monitoring, or mitigating the environmental and biological resource impacts of clean energy development. As a solar and storage developer, PearlX agrees with the CEC’s assessment that achieving the state’s clean energy goals by 2045 requires stakeholders be informed about risks to wildlife and plant communities and consider how those risks can be mitigated. However, the framing of this Research Group seems to – possibly inadvertently – minimize the critical role of rooftop solar in meeting SB 100 goals.

While it is important to consider the costs and benefits associated with dual use solar energy production and pollinator-friendly solar, the location of solar projects is a significant factor in a project’s value. First to consider are the benefits to the grid. A DER project can provide

additional benefits to the grid, depending on its location. The closer a solar and storage system is to the load center, the more effectively it can improve load management.

Second, the location of a DER project has environmental and land use implications. There are innumerable rooftops available to host solar and storage facilities without disrupting natural habitats or changing land use. This research can consider such avoided environmental costs in comparison to other forms of renewable energy generation.

PearlX suggests that CEC include research on the costs and benefits of greenfield solar projects versus rooftop solar projects and a comparison of the potential environmental impacts from different types of solar projects in Research Group 2: Assessing, monitoring, or mitigating the environmental and biological resource impacts of clean energy development of the Funding to Advance the Environmental Sustainability of the Clean Energy Transition.

Respectfully,

Mollie Corcoran
Director, Regulatory & Policy
PearlX Infrastructure LLC