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DRAFT

Commissioner Matthew Baker
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Commissioner Baker,

As members of the Disadvantaged Communities Advisory Group (DACAG), we serve to advise both the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) regarding the design and implementation of policies and programs that impact disadvantaged communities (DACs) in California. In this capacity, we provide input to help ensure that the state's energy policies and programs are effectively serving DACs, while also contributing to progress toward California's clean energy and pollution reduction goals.

The Disadvantaged Communities – Single-Family Solar Homes (DAC-SASH) Program directly serves the communities whose needs and interests we represent. We are aware that modifications to this program are currently being considered as part of the ongoing Rulemaking on Customer-Generated Renewables for Priority Communities (R.25-01-005), and we wish to offer our perspective and recommendations for your consideration.

We were concerned to see modifications to the DAC-SASH Program Handbook proposed by Energy Division staff on January 26, 2026, that would have ended collections for the program as of July 1, 2026¹ – several years prior to the 2030 collections end date previously established by the Commission. To our relief, the Administrative Law Judge's Ruling issued on April 2, 2026, appears to rescind the July 1, 2026, end date and affirm the Commission's previous decision to continue funding for the DAC-SASH Program through public purpose program funds should greenhouse gas allowance proceeds become unavailable.² We urge you and your fellow Commissioners to ensure that the DAC-SASH Program retains full funding through 2030 to support continued access to rooftop solar for low-income households in DACs.

The DAC-SASH Program is effectively meeting its primary goal of expanding access to rooftop solar for low-income households in DACs, which face unique adoption barriers and are too often excluded from participating in and benefiting from the clean energy transition. The majority of households served by DAC-SASH would be unable to access solar through market-rate offerings due to financial barriers, such as limited household savings to cover up-front

¹ *Administrative Law Judge Ruling Seeking Comments on Modifications to DAC-SASH*, Attachment B: "Staff Proposal: Redline Disadvantaged Communities – Single-Family Solar Homes Program Handbook", p1 line 39 & p2 lines 47-50:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M596/K296/596296839.PDF>

² *Administrative Law Judge's Ruling Correcting Error in Staff Proposal Redlined handbook Included with January 26, 2026 Administrative Law Judge Ruling*:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M604/K023/604023805.PDF>

investment costs as well as lack of access to capital and lease options due to insufficient credit. By enabling participants to overcome these barriers and receive rooftop solar at no cost, the DAC-SASH Program helps California achieve the directive of AB 327 to support the adoption of customer-sited renewable distributed generation among residential customers in DACs.

The DAC-SASH Program also provides deep, long-term bill savings to California ratepayers who face high energy burdens and often struggle to maintain safe and healthy homes. By reducing electric bills for these vulnerable households over the full lifetime of their solar systems, DAC-SASH improves their financial security and helps them avoid falling into arrears or risking disconnection. The program provides additional economic benefits within DACs that extend beyond program participants as well: the program's workforce development provisions help members of DACs, as well as formerly incarcerated individuals and others seeking to enter the workforce, develop skills and find long-term employment. On-site solar job training through DAC-SASH not only enables trainees to pursue careers within the solar industry, but also provides resources and connections that can launch careers in other high-road industries.

DAC-SASH supports California's pollution reduction goals. By building out new clean and renewable energy capacity in DACs, the program helps communities that are disproportionately impacted by unhealthy air and climate-warming greenhouse gas pollution from fossil fuels transition to energy sources that instead support local air quality, public health, and resilience. Further, DAC-SASH enables low-income households in DACs to pursue additional efficiency and electrification opportunities, many of which would otherwise remain out of reach.

While we deeply appreciate the Commission's commitment to reducing energy costs for all Californians, we hope that you share our belief that eliminating funding for DAC-SASH is not the right approach to do so. The CPUC must continue to prioritize energy affordability and equitable clean energy access for low-income households and DAC residents. We strongly encourage you and your fellow Commissioners to focus on identifying alternative pathways to address California's high energy costs rather than cutting programs like DAC-SASH. Instead, we encourage you to utilize this proceeding to further improve the DAC-SASH Program's ability to serve and benefit low-income households in DACs.

Thank you for your consideration.

Sincerely,

The Disadvantaged Communities Advisory Group (DAC-AG)