Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies

Study Title: Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs
Program: Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
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1	70 to 71	The main barrier to program implementation based on this research was the low number of solar developer responses to DAC-GT and CSGT solicitations. While PG&E has seen modest success in its solicitations for capacity, other PAs have had less success. In some cases, no responses were received to solicitations (e.g., SDG&E and SCE) despite SDG&E having almost as many contacts in its solicitation list as PG&E. In other cases, bids were received but were non-conforming (e.g., SCE). The relative success of PG&E may be in part due to it having a larger service territory that may have had solar developers with interconnection studies already begun at the time an RFO was released. Our outreach to solar developers from PA contact lists for a web survey yielded a low number of responses and identified many contacts that do not identify as solar developers. Lists from PAs also rarely had the same contacts, suggesting there are contacts that are only hearing about one of many PA solicitations. Only a quarter of responding solar developers reported that they reviewed the RFOs at all, suggesting that low awareness and interest may be contributing to the lack of responses to RFOs. The solar developers who *were* aware of RFOs reported challenges related to: • **Timeline and interconnection:** Solar developers reported that if there is no interconnection study in progress at the time of a solicitation, they need a longer timeline to be able to submit a bid to ensure they can complete an interconnection study. • **Siting and land costs**: We heard from solar developers that land costs present a barrier to proposing projects in the DACs and within the 5-mile surrounding boundaries of the DACs.	**1.1A:** The PAs should devote additional marketing and outreach efforts towards informing solar developers of bid opportunities to improve engagement and bid response. This may be more efficiently done by a centralized organization.	Rejected	**PA Response:** EBCE is not supportive of transferring responsibilities to a centralized organization, when the purpose of DAC-GT/CSGT programs is to deploy local, renewable development **Stakeholders:** Contracted third party **Timeline:**
2			**1.1B**: PAs should invest time and resources into further developing their contact lists for potential solar developers. They could also coordinate efforts and share contacts to maximize their reach.	Other	**PA Response:** EBCE supports coordination among each other to develop more robust contact lists of developers with consideration that this will take greater time to coordinate wit other PAs and potentially constrain PAs to exceed budget cost caps. **Stakeholders:** **Timeline:**
3			**1.1C:** The PAs should conduct solicitations for solar resources on a schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers).	Accepted	**PA Response:** EBCE agrees that allowing more time for development of the siting and interconnection processes could increase the number of bids. **Stakeholders:** **Timeline:**
4	72-73	With multiple PAs taking on similar activities, our evaluation identified key opportunities to streamline and combine efforts with the main focus on solar developer- and community-sponsored outreach and the solicitation process. Evergreen identified two areas where the program may benefit from a centralized coordinator taking on certain roles that are currently performed by each individual PA. ○ Solicitation Process and Outreach ○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	**1.3A:** The CPUC and/or the administrators should fund and convene a coordinating organization to market solicitations, match solar developers to community organizations and provide best practices to community organizations that want to sponsor CSGT projects. This coordinating organization should: ○ Centralize marketing and outreach to inform solar developers of bid opportunities across the PAs to increase awareness of and response to RFOs. ○ Invest time and resources into engaging with the solar developer market to increase awareness of the programs and expand developer contact lists. ○ Conduct solicitations for solar resources on a predictable schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers). ○ Inform and engage with potential community sponsors about CSGT bid opportunities.	Rejected	**PA Response:** EBCE does not support centralizing information, as it directly conflicts with the intent of the programs – local, community-driven projects. PAs have existing relationship with potential community sponsors that a centralized organization would not have. It defeats the purpose of the program if a statewide centralized entity were to engage with a small, local, community-based sponsor potentially hindering timelines. **Stakeholders:** **Timeline:**

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5	74	Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.	**1.4A**: CPUC: We recommend that similar to DAC-SASH (another program that focuses on DAC customers in single-family homes), the DAC-GT and CSGT programs should expand such that residents in California Indian Lands (i.e., lands within the limits of an Indian reservation and under the jurisdiction of the US government) are eligible for program offerings. This places the program in alignment with Decision 20-12-003, which expanded DAC-SASH in the same way, to align that program with the same underlying statute.	Accepted	**PA Response:** EBCE supports this recommendation. **Stakeholders:** CPUC **Timeline:**
6	71	Auto-enrollment allows money spent on marketing and outreach to instead become available to pay for the customer bill discount and allows for targeting of customers who are at higher risk of disconnection or who have higher bills. Auto-enrollment also allows a way around participation barriers that may make it harder for some customers to learn about the programs.	**1.2A**: CPUC: Consider using auto-enrollment for all PAs going forward for the DAC-GT program.	Other	**PA Response:** EBCE adopted the auto-enrollment method for the DAC-GT program, and we are very supportive of this process as it could eliminate access barriers especially for harder-to-reach customers. EBCE marked this suggestion as other because we would like to support PAs who think it is best to enroll their customers proactively. **Stakeholders:** **Timeline:**
7	74	Because most PAs had not yet launched the CSGT program at the time of the data request we sent to PAs, and because those that had successfully contracted CSGT programs had not yet begun construction, PAs were not able to provide us with specific estimates of the number of job trainees or specific workforce development metrics and goals.	**1.5A**: The PAs should require that workforce development attestations include hiring and training metrics, goals, and outcomes.	Other	**PA Response:** EBCE has several projects supporting workforce development by partnering with workforce dev organizations in its contracts. EBCE leans supportive on including attestations, but it should be noted to the Commission that this will further delay projects as another party is required to participate in the project development phase. Furthermore, EBCE would like more information from workforce development organizations on potential participation and project barriers. **Stakeholders:** CPUC **Timeline:**
8	75	This evaluation was intended to develop an evaluation framework including establishing metrics for assessing whether the programs are meeting their intended goals. We developed logic models and associated metrics for both programs. To assess the current and future evaluability of both programs, we categorized the 24 developed metrics (which tie to outcomes in the logic model) based on our ability to evaluate them. We were able to fully or partially evaluate more than two-thirds of the metrics. The metrics that require additional data are listed below. **Metric C2. Number of bids received per RFO**. Currently, we are unable to assess if solar developers are meeting the needs outlined in the RFOs and the full number of projects included in each response for all PAs. This number was available upon follow up from PG&E and was included in Independent Evaluator reports for SCE.	Where we were unable to assess metrics, we made recommendations for additional data that PAs should track to facilitate future evaluation of program achievements. We recommend PAs track the items below: **2.1A:** # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.	Accepted	**PA Response:** EBCE is supportive of this metric, but specific bid details may not be available for public view. **Stakeholders:** **Timeline:**
9	75	**Metric C3. Number and type of project sponsors (CSGT only).** We heard reports of challenges connecting to sponsors, and a review of documentation and materials could help identify what barriers may exist to more robust engagement of potential sponsors.	**2.1B**: Track outreach done with potential sponsors, messaging and materials used for that outreach, and sponsors contacted. Would be helpful to review event dates, number and type of attendees, and type of outreach done prior to event.	Other	**PA Response:** EBCE would like more information on how this metric could be used to increase engagement with potential sponsors. EBCE is tracking key marketing material, but find it administratively burdensome to track every interaction with a potential sponsor. **Stakeholders:** **Timeline:**
10	75	**C4. Results from program in both costs and benefits: number of MW installed/costs.** **C5. Results from program costs compared to non-program PV costs.** Current MW data are only for the cost of bringing in solar developers and selecting bids. Other program data include the cost of the MW acquired. Additionally, **if interested in evaluating program MW allocation**, need to define the amount of cost burden the program is willing to place on non-participants. Any comparison to other programs should take into account that non-participant cost is partially balanced by the non-participant experiencing the benefit of a cleaner grid.	**2.1C**: Investigate possibility of getting cost/MW installed from solar developers	Other	**PA Response:** Beyond the data that is already shared in the annual budget filing to the Commission, EBCE does not support sharing confidential energy cost information that could violate confidentiality contracts. **Stakeholders:** **Timeline:**

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11	76	**Metric E2. Share of enrolled customers aware of specific program features**. Future evaluations should also account for program attrition and compare attrition between auto-enrolled customers and opt-in customers.	**2.1D:** Track rates of attrition for program enrollees.	Accepted	**PA Response:** EBCE leans supportive of this metric, but would like clarification on attrition baselines to set. **Stakeholders:** **Timeline:**
12	76	**Metric P1. Number and location of eligible customers enrolled**. Location of DAC-GT and CSGT generation would facilitate a geospatial analysis of program coverage across the state, including the geographic spread of participating customers. These data are available from both CCAs and SCE in quarterly reports but are not available across all PAs.	**2.1E**: Report on location of DAC-GT and CSGT generation. This is not done by all PAs at this time.	Accepted	**PA Response:** This data is provided to the Commission as part of the annual budget filing, quarterly, and semi-annual reports to the Commission. **Stakeholders:** **Timeline:**
13	76	**P5. Additional participation in other clean energy programs.** Customer self report data was inaccurate and future evaluations should rely on CIS data to ensure more accurate estimates are made. **P4. # of master metered customers participating in the CSGT program.** Master metered data are only relevant for CSGT, which had no actively enrolled customers at the time of this evaluation.	**2.1F:** Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only). **2.1G:** Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.	Accepted	**PA Response:** Cross-promoted clean energy programs are tracked as part of the semi-annual reporting process. Cross-promotion of the San Joaquin Valley DAC pilot will be useful for EBCE customers in Tracy. **Stakeholders:** IOUs **Timeline:**
14	76	**J1. # of leveraged job training programs.** At the time of this evaluation, it was too soon to estimate the number of job training programs leveraged. These data need to be tracked first by workforce development partners rather than by PAs.	**2.1H:** Track job training programs used in the process of solar project development, including the training dates, curricula, and the number of trainees engaged with given programs.	Other	**PA Response:** EBCE has several projects supporting workforce development by partnering with workforce dev organizations in its contracts. EBCE leans supportive on including data about training programs, but it should be noted to the Commission that this will further delay projects as another party is required to participate in the project development phase. Furthermore, EBCE would like more information from workforce development organizations on potential participation and project barriers. **Stakeholders:** Workforce dev partners, community sponsors **Timeline:**
15	77	The large number of Program Administrators makes data review and collection cumbersome (multiple NDAs for instance) for evaluators and also creates a challenge for CPUC staff to track progress between evaluation cycles, which occur on a triannual basis. The same coordinating organization that handles the solar developer coordination could also take on a centralized data collection effort, or another organization could (e.g., one of the PAs or IOUs).	**2.1I**: We recommend the CPUC weigh the pros and cons of such a coordinator that could create a central website where information could be submitted and ensure that submitted information is similar across PAs.	Rejected	**PA Response:** EBCE does not support efforts of another LSE serving as a centralized entity. **Stakeholders:** contracted third party **Timeline:**
16	77	In some cases, there is still a lack of clarity on goals for the program's expected outcomes. For example, for the metric of "capacity procured and online by program PA," it would be helpful to set a goal for how much capacity should be procured online by the end of an evaluation period. These are mapped to metrics and outcomes in Table 32 of the report.	**2.2A**: CPUC to clarify: How much capacity is expected on what timeline?	Other	**PA Response:** EBCE does not have an informed opinion at this time. **Stakeholders:** CPUC **Timeline:**
17	77		**2.2B**: CPUC to clarify: What is the minimum acceptable number of conforming bids, and how many conforming bids would be ideal?	Other	**PA Response:** EBCE does not have an informed opinion at this time. **Stakeholders:** CPUC **Timeline:**
18	77		**2.2C**: CPUC to clarify: What level of awareness of the program by participants is ideal? Is awareness of benefit an integral part of the program?	Other	**PA Response:** EBCE does not have an informed opinion at this time. Auto-enrollment will affect awareness levels. **Stakeholders:** CPUC **Timeline:**

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19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response:** EBCE does not have an informed opinion at this time. Auto-enrollment will affect awareness levels. **Stakeholders:** CPUC **Timeline:**
20	77		**2.2E**: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Other	**PA Response:** EBCE leans not support further geographically prioritizing one community over another, as there are already very targeted eligibility rules. **Stakeholders:** CPUC **Timeline:**
21	77		**2.2F:** CPUC to clarify: Is a goal of the program to reach customers in specific segments (such as households with primary languages other than English, certain household compositions, or households receiving utility assistance)?	Other	**PA Response:** EBCE could be supportive of discussing this further but would like to know the Commission's intent to the DAC-GT/CSGT program. Are the program's objectives meant to meet a subsection of customers? **Stakeholders:** **Timeline:**
22	78		**2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	**PA Response:** EBCE does not have an informed opinion at this time. **Stakeholders:** CPUC **Timeline:**
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	**PA Response:** EBCE does not have an informed opinion at this time because there is not enough available data to determine the current program. **Stakeholders:** **Timeline:**
24	78		**2.2I**: CPUC to clarify: What percentage of customers would the program expect to see who feel that they are contributing to renewable energy?	Other	**PA Response:** EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. **Stakeholders:** CPUC **Timeline:**
25	78		**2.2J:** CPUC to clarify: What percentage of customers would the program like to achieve in terms of customers feeling like the program reduces GHG emissions?	Other	**PA Response:** EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. **Stakeholders:** **Timeline:**
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	**PA Response:** EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. **Stakeholders:** CPUC **Timeline:**
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	**PA Response:** EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. **Stakeholders:** CPUC **Timeline:**

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28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	**PA Response:** EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. **Stakeholders:** CPUC **Timeline:**
29	78-79	This evaluation was conducted when it was too soon to take on the following evaluation activities.	**2.2N**: For future evaluations, the following should be prioritized: • On-site verification of solar project performance through methods such as monitoring energy generation; • An economic and job impact assessment; and • An assessment of the impacts from the changes in funding sources that will begin during the year 2022.	Rejected	**PA Response:** On-site verification is unnecessary and meter data or WREGIS data to confirm generation is sufficient. **Stakeholders:** **Timeline:**
30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solicitations; this group was much smaller than expected, with just a quarter of survey respondents reporting having reviewed at least one program RFO.	**2.2O**: CPUC: We recommend conducting a study of the broader market of solar developers focused on sharing the range of possible RFO features with respondents to assess what the major challenge points are that limit RFO participation such as land costs, siting, and interconnection barriers.	Accepted	**PA Response:** EBCE supports the study including limitations on land costs, siting, and interconnection. **Stakeholders:** **Timeline:**