**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
**Link to Report:** 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.<br><br>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.<br>The solar developers who *were* aware of RFOs reported challenges related to:<br>• **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.<br>• **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. | Other | **PA Response:**<br><br>**SJCE rejects the creation of a centralized organization to engage in additional ME&O efforts. Adding a third-party entity would not only complicate the process for prospective bidders but could also potentially increase costs if the solicitation process is lengthened.**<br><br>**SJCE is not opposed to devoting additional ME&O efforts towards interacting with solar developers if (1) the ME&O cap is increased to allow for such efforts without depleting other program funding, and (2) it is shown that lack of adequate outreach is the reason for the low number of responses. Marketing may not be the primary reason why project developers are not bidding. Many projects have small capacities which are in between the typical sizes for rooftop installations and larger scale projects. For example, SJCE's 1.7MW DAC-GT allotment was very unlikely to be served by wind at all, so solar became the main viable resource option for renewable electricity. More review of how project requirements affect bidding could be useful to understand whether it is market awareness or market misalignment that are causing issues.**<br><br>**Stakeholders:**<br>**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:**<br><br>**Related to response in 1.1A**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 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:**<br><br>**SJCE would support a minimum solicitation period for RFOs that accommodates the development of siting and interconnection processes to increase participation of developers; however, SJCE believes that all PAs should not be required to issue RFOs at the same time each year.**<br><br>**Stakeholders:**<br>**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.<br>○ Solicitation Process and Outreach<br>○ 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.<br>This coordinating organization should:<br>○ Centralize marketing and outreach to inform solar developers of bid opportunities across the PAs to increase awareness of and response to RFOs.<br>○ Invest time and resources into engaging with the solar developer market to increase awareness of the programs and expand developer contact lists.<br>○ 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).<br>○ Inform and engage with potential community sponsors about CSGT bid opportunities. | Rejected | **PA Response:**<br><br>**Related to response in 1.1A.**<br><br>**SJCE does not administer CGST.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 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:**<br><br>**SJCE would be supportive of extending these programs to residents in California Indian Lands.**<br><br>**Stakeholders:**<br>**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. | Accepted | **PA Response:**<br>**While SJCE has decided to pursue auto-enrollment in 2022 in order to ensure program spots are filled (and therefore maximize the number of customers receiving discounts), SJCE considers the outreach and elective enrollment process at launch to be extremely important in reaching underserved and hard-to-reach communities such as Spanish and Vietnamese speakers. Care should be taken with setting the rules for auto-enrollment to ensure that underserved customers are equitably included.**<br><br>**Stakeholders: Customers typically underserved by programs**<br>**Timeline: June 2022** |
| 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. | Accepted | **PA Response:**<br><br>**SJCE does not administer CGST.**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 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.<br><br>**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:<br><br>**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:**<br><br>**SJCE would be willing to share the number of conforming and non-conforming bids differentiated by the number of submitted offers versus the number of proposed projects in those offers for the next triennial review.**<br><br>**Stakeholders:**<br>**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. | Accepted | **PA Response:**<br><br>**SJCE does not administer CGST.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 10 | 75 | **C4. Results from program in both costs and benefits: number of MW installed/costs.**<br>**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.<br><br>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 | Rejected | **PA Response:**<br><br>**Disclosing cost/MW installed provided in bids would require SJCE to divulge information that constitutes confidential and market sensitive information. Additionally, for executed bids, SJCE provides this information in the power purchase agreements it submits to the CPUC per Resolution E-5124.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 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. | Other | **PA Response:**<br><br>**Measuring attrition may not provide much insight into whether a customer (regardless of enrollment) knows certain features of the program. Move-outs, switching rates, and CARE/FERA expiration are all common reasons for customer attrition for SJCE. It should not be assumed that customers are weighing these changes against their enrollment in DAC-GT. It may be more useful to measure reasons for attrition across eligibility criteria (e.g. CARE/FERA, location in a DAC) to understand how eligibility criteria over time affect enrollment.**<br><br>**Stakeholders:**<br>**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. | Rejected | **PA Response:**<br><br>**SJCE already provides this in Quarterly Reports (i.e. number of customers enrolled by DAC tract) and in the Annual Budget Advice Letters.**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 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.<br><br>**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).<br><br>**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:**<br><br>**SJCE would be open to share enrollment data for participants receiving Energy Savings Assistance in an SJCE-administered program. However, metrics outside of SJCE's own programs would be best provided by PG&E as this isn't data SJCE readily has access to.**<br><br>**Stakeholders:**<br>**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:**<br><br>**As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting.**<br><br>**Stakeholders:**<br>**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. | Other | **PA Response:**<br><br>**SJCE is not opposed to centralizing data, however the development of a website specifically for DAC-GT data, which is only submitted quarterly, may not be worth the effort. This development should not come from PAs' existing budgets, nor should any new data reporting rules significantly increase the administrative burden of reporting program data.**<br><br>**Stakeholders:**<br>**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:**<br><br>**SJCE would support CPUC establishing a general timeline for reaching capacity but not a specific date for doing so as this would not take into consideration the processes of various PAs.**<br><br>**Stakeholders:**<br>**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:**<br><br>**SJCE would require more clarification for the use of this metric. It opposes setting a minimum amount of acceptable conforming bids if this would result in penalties to PAs.**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 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? | Accepted | **PA Response:**<br><br>**SJCE would be interested in the CPUC clarifying what constitutes awareness of the program and how levels of awareness would be quantified. Awareness of the benefits of access to renewable energy at a discounted price is integral to the rate of participation; however, there are other factors that drive participation in the DAC-GT program.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 19 | 77 | | **2.2D**: CPUC to clarify: What percentage of awareness is important for the program? | Accepted | **PA Response:**<br><br>**SJCE would be interested in CPUC clarifying what constitutes awareness of the program and how awareness would be measured and identified.**<br><br>**Stakeholders:**<br>**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:**<br><br>**As PAs are more equipped to understand the needs of specific geographic areas, SJCE believes it would be inappropriate for CPUC to determine where there should be further geographic targeting. Without proper understanding of various PAs service territories, the CPUC could limit the ability of eligible customers from enrolling by identifying other geographic areas as higher priority.**<br><br>**Stakeholders:**<br>**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)? | Accepted | **PA Response:**<br><br>**SJCE supports a goal for PAs to tailor its ME&O efforts to reach all factions of DAC service areas but would not be receptive to CPUC setting metrics PAs must reach in their administration of the program. Providing this data may prove to burdensome on PAs.**<br><br>**Additionally, SJCE already makes this a goal to reach customers of varying backgrounds and languages when engaging in ME&O efforts for the DAC-GT program.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 22 | 78 | | **2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success? | Other | **PA Response:**<br><br>**SJCE does not administer CGST.**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 23 | 78 | | **2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see? | Other | **PA Response:**<br><br>**SJCE is unsure if an imposition of additional enrollment targets would benefit the implementation of the DAC-GT program. This additional requirement may be a hinderance this early in the program.**<br><br>**Stakeholders:**<br>**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:**<br><br>**SJCE would require further clarification on how this metric will be tracked/gathered.**<br><br>**Stakeholders:**<br>**Timeline:** |
| u | 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:**<br><br>**SJCE would require further clarification on how this metric will be tracked/gathered.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 26 | 78 | | **2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits? | Other | **PA Response:**<br><br>**SJCE would like further clarification on how this metric will be tracked/gathered.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 27 | 78 | | **2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected? | Other | **PA Response:**<br><br>**As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting.**<br><br>**Stakeholders:**<br>**Timeline:** |
| 28 | 78 | | **2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected? | Other | **PA Response:**<br><br>**As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting.**<br><br>**Stakeholders:**<br>**Timeline:** |

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| 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:<br>• On-site verification of solar project performance through methods such as monitoring energy generation;<br>• An economic and job impact assessment; and<br>• An assessment of the impacts from the changes in funding sources that will begin during the year 2022. | Accepted | **PA Response:**<br><br>**SJCE is generally supportive of these topics in future evaluations but does not feel on-site verification of solar project performance is required. Energy generation data can be gleaned from meter data or WREGIS data.**<br><br>**Stakeholders:**<br>**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:**<br><br>**SJCE is supportive of a broader market study of solar developers.**<br><br>**Stakeholders:**<br>**Timeline:** |