SCE Response to Recommendations (RTR) in Process Evaluation

Study Title: Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs
Program: Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT)
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				SOUTHERN CALIFORNIA EDISON COMPANY (SCE)	
Item #	**Page #**	**Findings**	**Best Practice / Recommendations**	**Disposition**	**Disposition Notes**
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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.	Accepted	**PA Response:** Clarity is requested on who covers the cost for this activity. **Stakeholders:** Unknown **Timeline:** Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation.
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.	Rejected	**PA Response:** SCE is not comfortable sharing contact lists due to confidentiality concerns. **Stakeholders:** N/A **Timeline:** N/A
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:** SCE runs two RFOs per year and has launched those RFOs at the same time since these programs started. As part of the submission requirements for developers on this and all other RFO's, SCE conducts prerequisites to determine project viability including site control and either an interconnection study or executed Interconnection Agreement. SCE proposes that solicitations be run annually, rather than bi-annually and is open to extending the offer submission window but is not open to easing the project viability requirements needed to select viable offers. **Stakeholders:** Developers **Timeline:** SCE will need 6 months from application approval to update RFO materials to incorporate changes from application and request CPUC approval of launch documents.

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.	Other	**PA Response:** If this recommendation is specific to marketing and outreach then SCE accepts the recommendation and would need clarity on who covers the cost for this activity. If the recommendation is related to centralizing RFO solicitations, then SCE rejects a centralized entity to perform this work. **Stakeholders:** Unknown **Timeline:** If this recommendation is specific to marketing and outreach, then the timeline is contingent upon approval of the application and subsequent approval of corresponding program budget advice letter. If the recommendation is related to centralizing RFO solicitations, then the timeline is not applicable.
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:** SCE supports residents in California Indian Lands being eligible for this program **Stakeholders:** N/A **Timeline:** Contingent approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, SCE will likely need several months after this to implement required billing system changes to track Indian lands as well as system changes to the enrollment tool.
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:** SCE supports using auto-enrollment going forward for SCE's DAC-GT program. **Stakeholders:** N/A **Timeline:** Contingent approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, the vendor will likely need several months after this to implement due to required system changes to the enrollment tool.
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:** Although SCE is supportive of this recommendation, we do have an ongoing concern that metrics may increase costs and impact the developer's decision to participate in the solicitations. **Stakeholders:** Developers **Timeline:** Contingent upon approval of the application.
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.	Rejected	**PA Response:** SCE does not support this recommendation since the information is confidential and already provided to Energy Division via the confidential Independent Evaluator report. **Stakeholders:** N/A **Timeline:** N/A

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, any type of outreach done prior to event.	Accepted	**PA Response:** SCE can provide this information if requested **Stakeholders:** N/A **Timeline:** Contingent upon approval of the application.
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 nonparticipant cost is partially balanced by the nonparticipant experiencing the benefit of a cleaner grid.	**2.1C**: Investigate possibility of getting cost/MW installed from solar developers	Rejected	**PA Response:** SCE would be unable to provide this information because the costs of installed MWs would come from developers and could vary greatly from project to project. The developers do not share this information with SCE and likely would not want to share this with SCE, since that information is proprietary. **Stakeholders:** Developers **Timeline:** N/A
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.	Rejected	**PA Response:** Data has shown little or no attrition. SCE does not support a proposal to monitor attrition rate since the assumption is that most customers would want the 20% bill discount. It is SCE's belief that attrition would likely only be a result of customers closing their account. This would be difficult to track, is not informative, and would be hard to determine the reason for dropping out of the program. **Stakeholders:** N/A **Timeline:** N/A
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.	Other	**PA Response:** SCE already reports out the customer count by census tract, along with the census tract that the project is in for each program. If needed, SCE can separate the reporting out by Project as opposed to program. However, customer-specific information is confidential and cannot be shared. **Stakeholders:** N/A **Timeline:** Already providing this information.
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.	Rejected	**PA Response:** **Response to 2.1F -** SCE supports having accurate data, but SCE questions the usefulness of this data as it relates to any modifications to the DAC-GT/CSGT programs. In addition, SCE requests clarification of which clean energy programs that would be tracked, since DAC GT/CSGT customers are not eligible for NEM and other green energy programs. Program participation data would have to be limited to what is available in SCE system(s). For example, we may have minimal (if any) program participation information for customers on a master meter or served by a CCA. If the data is regarding SJV customers, SCE already provides this information at the census tract level in the quarterly progress report. Customer-specific information is confidential and cannot be shared. **Response to 2.1G -** SCE supports having accurate data, but SCE questions the usefulness of this data as it relates to any modifications to the DAC-GT/CSGT programs. In addition, program participation data would have to be limited to what is available in SCE system(s). For example, we may have minimal (if any) program participation information for customers on a master meter or served by a CCA. If the data is regarding SJV customers, SCE already provides this information at the census tract level in the quarterly progress report. Customer-specific information is confidential and cannot be shared. **Stakeholders:** N/A **Timeline:** N/A

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.	Accepted	**PA Response:** This information is provided by Developers upon SCE's request. As such, SCE agrees with the recommendation to provide this information as it is provided by Developer(s) no more than once per year. **Stakeholders:** Developers **Timeline:** Developers already providing this information.
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:** SCE recommends that we leverage DG Stats to submit DAC data on a quarterly basis and also eliminate the quarterly filing of the DAC progress report. Instead, incorporate into the data that would be submitted to DG Stats. **Stakeholders:** Energy Solutions (vendor for DG Stats) **Timeline:** Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, the vendor will likely need several months after this to implement the reporting requirements.
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
22	78		**2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** N/A **Stakeholders:** N/A **Timeline:** N/A
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A

27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A
28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	**PA Response:** N/A **Stakeholders:** N/A **Timeline:** N/A
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:** The benefits of the recommendation are unclear. There are already performance obligations by developers under the contracts by SCE. Additionally, changes funding source from GHG to Public Purpose funds for volumetric costs such as the 20% discount should not have any impact on the customers as the DAC decision already contemplates the use of Public Purpose funds should GHG funding run out. **Stakeholders:** Developers **Timeline:** N/A
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:** Clarity needed on who covers cost for this activity. SCE recommends this activity not be a standalone activity but be included in the next program evaluation which occurs every three years. **Stakeholders:** Independent Evaluator **Timeline:** Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation.