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
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				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	**Page #**	**Findings**	**Best Practice / Recommendations**	**Disposition**	**Disposition Notes**
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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.	Reject	**SDG&E Response:** This recommendation would not necessarily change the outcomes. SDG&E's main challenges with the programs are that land costs are expensive in the county, including within its DACs, which are urban and coastal, as correctly noted in the evaluation. The contracts for these programs must be procured from within DACS. SDG&E also has smaller numbers of DACs compared to PG&E and SCE. Therefore, SDG&E does not see the issue as needing to better promote or market its RFP opportunities since that does not solve land availability, locations, or costs. **Stakeholders: N/A** **Timeline: N/A**
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.	Reject	**SDG&E Response:** SDG&E believes that it should be well known among developers that California IOUs have the DAC-GT and CSGT programs available to them. Additionally, SDG&E posts publicly on its website when it runs DAC-GT and CSGT solicitations, as well as distributes the solicitation announcement to an excess of 2,600 email recipients, including mostly developers, to encourage interest in bidding into the program. SDG&E continually updates its contacts list and encourages all interested developers to reach out to be added to this distribution list and distribution of all RPS notices posted by SDG&E for development procurement opportunities. **Stakeholders: N/A** **Timeline: N/A**

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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).	Reject	**SDG&E Response:** SDG&E believes that siting and interconnection of projects should be well-established prior to the project entering into the competitive solicitation process. SDG&E's DAC-GT and CSGT solicitations cycles to procure these projects are held in approximately the same schedule each year, so the general schedule developers should be working with can easily anticipate the siting and interconnection timing prior to bidding the proposed project into a DAC-GT and CSGT solicitation process. Additionally, it seems unclear to SDG&E how projects could bid a project into these competitive solicitations without knowing siting and interconnection costs and timelines, so SDG&E fails to see how this could improve bidder success. **Stakeholders: N/A** **Timeline: N/A**
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.	Reject	**SDG&E Response:** This recommendation would seem to potentially increase effort, complexities, and costs (to cover the coordination or centralization) and does not address SDG&E's primary challenges. If the recommendation is fully understood correctly, SDG&E would also be concerned with any coordination efforts done in solicitations since such solicitations must limit who sees such bids, maintain confidentiality of bids and competitive fairness. Firewalls and other mechanisms would need to be in place to ensure adequate controls, which would add complexities. **Stakeholders: N/A** **Timeline: N/A**
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.	Other	**PA Response:** SDG&E does not object to this recommendation but is unsure whether this would have any impact in SDG&E's territory. **Stakeholders: N/A** **Timeline: N/A**
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.	Reject	**SDG&E's Response:** SDG&E objects that this be mandated to all IOUs as it would increase IT and other administration costs and is not guaranteed to be of any benefit. SDG&E's challenges are not in enrolling customers, but in it receiving any bids into the RFPS. **Stakeholders: N/A** **Timeline: N/A**
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.	Accept	**SDG&E's Response:** Supports. SDG&E found this recommendation to be valuable and actionable. **Stakeholders: PAs** **Timeline: TBD**

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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. **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.	Accept	**SDG&E's Response:** Supports. SDG&E found this recommendation to be valuable and actionable. **Stakeholders: PAs** **Timeline: TBD**
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.	Reject	**SDG&E's Response:** The Community Solar model is that the solar developers are to market their own projects once they have been bid into the RFPs and contracted under PPAs with the IOU at prices that are under the CSGT bid cap. As a policy matter, SDG&E does not endorse any developers or do outreach on their behalf to sponsors. SDG&E cannot know whether any solar developer who bids and contracts is viable, and capable of building a system and interconnecting to the grid, nor does SDG&E do that analysis to determine such. SDG&E cannot risk its relationships with community-based organizations to assist for-profit solar companies that SDG&E has no way to assess, nor is that an appropriate role for the utility. **Stakeholders: N/A** **Timeline: N/A**
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	Accept	**SDG&E's Response:** Supports. SDG&E does not object to this; it would be reasonable to undertake and would add value to the evaluation process in the future. **Stakeholders: Solar Developers and PAs** **Timeline: TBD**
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.	Accept	**SDG&E Response:** Supports. SDG&E does not object to this, it would be reasonable to undertake and would add value to the evaluation process in the future. **Stakeholders: PAs** **Timeline: TBD**

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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	**SDG&E's Response:** SDG&E is neutral on this as it may not apply to SDG&E under the current constraints of the programs. At a minimum, SDG&E is unclear as to how the recommendation of reporting on the location of generation should be done, when SDG&E has no generation for CSGT and DAC-GT. Also, this recommendation is made to tie to the numbers of customers enrolled as a metric, which SDG&E has none. **Stakeholders: N/A** **Timeline: N/A**
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.	Reject	**SDG&E's Response:** SDG&E does not currently capture program data for the majority of its clean energy programs. Additionally, SDG&E is not the Program Administrator for some clean energy programs in its service territory, such as SGIP, DAC-SASH, SOMAH, CSI Thermal, etc., and would not have customer-level data. This requirement could impose a significant IT investment. Given that SDG&E does not have any customers enrolled and is unlikely to under current circumstances, investing in this upgrade is not an effective use of funds or resources. **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.	Other	**SDG&E's Response: S**DG&E would be procuring energy through RFPs for these programs and would need to include questions about this in the RFP itself. However, what a developer may report at the RFP stage may not be what the actual result is. So, without further investigation and/or reporting done to SDG&E by such a developer, for projects underway, SDG&E may not have insight into actual job training done by the solar developers. If this became a requirement, SDG&E would need to increase its administration costs to develop a system to be able to verify the work training that is being done and to have insight into this area for activity today it does not monitor. It would also require an increased budget. **Stakeholders: N/A** **Timeline: N/A**
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.	Reject	**SDG&E's Response:** There are multiple programs operated by each IOU, and across the state, and the CPUC and its evaluators regularly gather data from multiple sources. These programs do not have larger numbers of administrators than many other programs. The argument to add significant costs and a centralized coordinator is unsupported by the evidence. **Stakeholders: N/A** **Timeline: N/A**

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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?	Neutral	**PA Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **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?	Neutral	**PA Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **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?	Neutral	**PA Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **Stakeholders: N/A** **Timeline: N/A**
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Neutral	**PA Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **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?	Neutral	**PA Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **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)?	Reject	**SDG&E Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. That being said, SDG&E might not track certain data associated with specific customer segments. Depending on the segment, SDG&E might lack the ability to target those segments and meet the corresponding goals. SDG&E does track, in this example, if a customer is on CARE/FERA or if the customer has requested materials in a language other than English. **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?	Reject	**SDG&E's Response:** The IOUs cannot control what solar developers bid into the RFPs with variables such as availability and cost of land located in DACs, etc. Therefore, the IOUs should not be held to any goal for enrollment. **Stakeholders: N/A** **Timeline: N/A**

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23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Reject	**SDG&E's Response:** The IOUs cannot control what solar developers bid into the RFPs with variables such as availability and cost of land located in DACs, etc. Therefore, the IOUs should not be held to any goal for enrollment. **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?	Neutral	**SDG&E's Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **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?	Neutral	**SDG&E's Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **Stakeholders: N/A** **Timeline: N/A**
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Neutral	**SDG&E's Response:** N/A this comment is directed at the CPUC and SDG&E has no position at this time. **Stakeholders: N/A** **Timeline: N/A**
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Reject	**SDG&E's Response:** The IOUs cannot control the number or types of bids into the RFPs, and the corresponding job training that would result. The IOUs could encourage it, but not control it or be held to any metric. **Stakeholders: N/A** **Timeline:**
28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Reject	**SDG&E's Response:** The IOUs cannot control the number or types of bids into the RFPs, and the corresponding job training that would result. The IOUs could encourage it, but not control it or be held to any metric. **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.	Support	**SDG&E's Response:** This is directed to the CPUC. However, SDG&E would support this as an additional compliance measure. **Stakeholders: Solar Developers and PAs** **Timeline: N/A**

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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.	Reject	**SDG&E's Response:** This is directed to the CPUC. However, SDG&E believes this seems unnecessary to do at ratepayer expense and would be a responsibility of the solar industry groups and only if they should see value in it themselves. **Stakeholders: N/A** **Timeline: N/A**