

June 6, 2025

Advice No. 164-E-A
(Center for Sustainable Energy®)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Supplemental: Tier 2 Advice Letter: Comprehensive Update to the Solar On Multifamily Affordable Housing (SOMAH) Program to Incorporate the Changes Adopted by Decision 24-11-006 into the SOMAH Program Implementation Plan and Program Handbook

PURPOSE

Center for Sustainable Energy® (CSE), on behalf of the Program Administrator (PA) Team for the Solar On Multifamily Affordable Housing (SOMAH) Program, submits this Supplemental Advice Letter (AL) to CSE Advice Letter 164-E, which proposed a comprehensive update to the SOMAH Program to incorporate the changes adopted by Decision (D.)24-11-006 into the SOMAH Program Implementation Plan (PIP) and Program Handbook where necessary for their implementation, as directed by Ordering Paragraph (OP) 10 of D.24-11-006 (Decision).

At the advice of Energy Division and after further review of the proposed revisions to the SOMAH PIP and Program Handbook, the SOMAH PA seeks to correct a typographical error in the SOMAH PIP, remove all references to “battery” or replace the references to “battery” with “energy” with respect to storage in the SOMAH Handbook, remove a reference to behind the meter (BTM) systems in the SOMAH Handbook, clarify that an energy storage system’s entire capacity may be allocated to common area loads in the event of a grid outage, provide further details for completed solar projects seeking to add integrated storage including clarification that storage projects completed earlier than November 14, 2024 cannot be considered for the storage incentive; and provide further details in the SOMAH Handbook regarding how the storage incentive takes account of federal investment tax credits and contributions from other sources. Accordingly, this Supplemental Advice Letter supplements the original CSE Advice Letter 164-E but does not replace it in its entirety.

DISCUSSION

Subsequent to the submittal of the original AL, the SOMAH PA was made aware of a typographical error in the SOMAH PIP, the need to remove all references to “battery” or

replace the references to “battery” with “energy” with respect to storage in the SOMAH Handbook, the need to remove a reference to behind the meter (BTM) systems in the SOMAH Handbook, the need to clarify that an energy storage system’s entire capacity may be allocated to common area loads in the event of a grid outage, the need to add further details for completed solar projects seeking to add integrated storage including clarification that storage projects completed earlier than November 14, 2024 cannot be considered for the storage incentive, as well as the need to provide further details in the SOMAH Handbook regarding how the storage incentive takes account of federal investment tax credits and contributions from other sources. The original AL was suspended as of May 11, 2025, the requested effective date. Accordingly, the SOMAH PA submits this Supplemental AL to make the necessary corrections and provide further clarifications, supplementing the original CSE Advice Letter 164-E but not replacing it in its entirety.

The proposed revisions to the SOMAH PIP and SOMAH Program Handbook are summarized below and shown in redlined format in Attachments A and B, respectively.

Revisions to SOMAH PIP

A. Correction to Typographical Error on Page 6 of the SOMAH PIP

This change:

Adds a semi-colon to the text on page 6 of the SOMAH PIP.

Affected PIP Section:

- I. Introduction, page 6

Revisions to SOMAH Program Handbook

A. Remove “battery” or Replace “battery” with “energy” with respect to Storage throughout the SOMAH Handbook

This change:

Removes all references to “battery” or replaces the references to “battery” with “energy” with respect to storage.

Affected Handbook Section:

- Various throughout Handbook

B. Remove Reference to Behind the Meter (BTM) Systems from Section 2.4 of the SOMAH Handbook and Provide Further Details regarding the Requirements for Integrated Energy Storage

These changes:

Remove the reference to “behind the meter” (BTM) systems from SOMAH Handbook Section, 2.4 Integrated Battery Storage Requirements, to properly align with the SOMAH VNEM tariff.

Clarify that an energy storage system's entire capacity may be allocated to common area loads in the event of a grid outage.

Provide further details for completed solar projects seeking to add integrated storage, including clarification that storage projects completed earlier than November 14, 2024 cannot be considered for the storage incentive.

Affected Handbook Sections:

- 2.4 Integrated Battery Storage Requirements
- 2.4.1 Completed SOMAH Solar Projects Seeking to Add Integrated Storage

C. Provide Further Details regarding How the Storage Incentive Takes Account of Federal Investment Tax Credits and Contributions from Other Sources to Section 3.2 of the SOMAH Handbook

This change:

Provides further details to SOMAH Handbook Section 3.2, Accounting for Other Funding, to provide greater clarity regarding how the storage incentive takes account of federal investment tax credits and contributions from other sources.

Affected Handbook Section:

- 3.2 Accounting for Other Funding

TIER DESIGNATION

Pursuant to General Order (GO) 96-B and OP 10 of D.24-11-006, this Supplemental AL is submitted with a Tier 2 designation.

PROTESTS

Because the revisions proposed in this Supplemental AL only correct typographical errors or provide additional clarifications to previously unprotested revisions and are proposed on the advice of Energy Division, the SOMAH PA respectfully requests that the Commission not reopen the protest period for CSE Advice Letter 164-E in accordance with GO 96-B, General Rule 7.5.1.

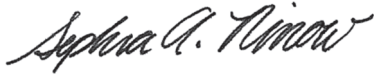
EFFECTIVE DATE

CSE requests that this Supplemental AL become effective as of thirty (30) days after submittal of the original AL 164-E, i.e., May 11, 2025, in accordance with GO 96-B, General Rule 7.5.1.

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NOTICE

Pursuant to GO 96-B, General Rule 4, CSE is serving copies of this Supplemental AL to service list R.14-07-002, A.16-07-015 (consolidated).



Sephra A. Ninow, J.D.
Director, Regulatory Affairs
Center for Sustainable Energy®

cc: Service List R.14-07-002, A.16-07-015 (consolidated)

Attachments: Attachment A – Proposed Revised SOMAH Program Implementation Plan (redlined)
Attachment B – Proposed Revised SOMAH Program Handbook (redlined)



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Center for Sustainable Energy® (CSE)

Utility type:

☐ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

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EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

June 6, 2025

Advice Letter (AL) #: 164-E-A

Tier Designation: 2

Subject of AL: Supplemental: Proposed Comprehensive Update to the SOMAH Program to Incorporate the Changes Adopted by D.24-11-006 into the SOMAH Program Implementation Plan and Program Handbook

Keywords (choose from CPUC listing): Rebates; Solar; Storage

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.24-11-006

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information: N/A

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? ☐ Yes ☒ No

Requested effective date: 5/11/25

No. of tariff sheets: 0

Estimated system annual revenue effect (%): 0

Estimated system average rate effect (%): 0

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: Supplemental: Proposed Comprehensive Update to the SOMAH Program

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

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Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Notice of Availability

On behalf of the Program Administrator (PA) Team for the Solar On Multifamily Affordable Housing (SOMAH) Program, Center for Sustainable Energy® (CSE) hereby provides notice that due to the size of Attachment A, an electronic copy of the redlined Proposed Revised SOMAH Program Implementation Plan illustrating the proposed revisions may be viewed at:

www.calsomah.org/PIpv5

and due to the size of Attachment B, an electronic copy of the redlined Proposed Revised SOMAH Program Handbook illustrating the proposed revisions may be viewed at:

www.calsomah.org/redlines14

If you have any problems accessing these documents, please contact Sephra Ninow via e-mail at sephra.ninow@energycenter.org.

Thank you!

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a Successor to Existing Net Energy Metering Tariffs Pursuant to Public Utilities Code Section 2827.1, and to Address Other Issues Related to Net Energy Metering.	RULEMAKING 14-07-002 (Filed July 10, 2014)
And Related Matter.	Application 16-07-015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this *CSE Advice Letter 164-E-A*, on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.14-07-002, A.16-07-015 (consolidated).

Executed on June 6, 2025, in San Francisco, CA.

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[CPUC Home](#)



**California
Public Utilities
Commission**



CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1407002 - CPUC - OIR TO DEVELO
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: APRIL 8, 2025

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

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