



Solar on Multifamily  
Affordable Housing



SOMAH  
**Semiannual  
Progress Report**

---

Reporting period  
July 1, 2020 – December 31, 2020



## Table of Contents

1. Executive Summary .....	5
1.1 COVID-19 Acknowledgement .....	5
2. Background .....	6
2.1 Application Pathways: Track A and Track B .....	7
2.2 Eligibility Options: Qualification Option A — Low-Income and Qualification Option B — Disadvantaged Communities.....	8
2.3 Program Budget.....	9
2.3.1 Program Administrative Budget.....	9
2.3.2 Program Incentive Budget .....	9
3. Program Progress — Key Performance Areas .....	13
3.1 Program Administration.....	13
3.1.1 Applications and Incentive Statistics.....	13
3.1.2 Online Bidding Tool .....	27
3.1.3 California Distributed Generation Statistics.....	28
3.2 Marketing Education and Outreach.....	28
3.2.1 Contractors.....	31
3.2.2 Property Owners.....	34
3.2.3 Tenants.....	36
3.2.4 Other Stakeholders .....	37
3.2.5 ME&O 2021 Plan.....	38
3.3 Workforce Development.....	39
3.3.1 Local Hiring and Job Training.....	40
3.4 Technical Assistance.....	41
3.4.1 Upfront TA .....	42
3.4.2 Standard TA .....	43
4. Program Planning and Development.....	44
4.1 Reporting, Feedback and Accountability Mechanisms.....	45
4.1.1 Public Forums.....	45
4.1.2 IOU Working Group .....	46
4.1.3 SOMAH Advisory Groups .....	47
4.1.4 Third-Party Program Evaluation.....	49
4.2 Program Design and Updates .....	50
4.2.1 Program Handbook.....	50
4.2.2 PA Market Research .....	52
4.2.3 CPUC DAC Participation Memo .....	56
5. Conclusions .....	57
6. Appendix A .....	59



7. Appendix B.....64



## Table of Figures

Figure 1 – Track A and Track B Application Steps .....	8
Figure 2 – Total Program Administrative Expenditures by Category.....	9
Figure 3 – Project Capacity and Budget .....	11
Figure 4 – Cumulative Program Budget .....	12
Figure 5 – Application Status by IOU Territory .....	13
Figure 6 – Cumulative Applications Received .....	15
Figure 7 – Construction Timeline Insights .....	16
Figure 8 – Applications by Incentive Track .....	17
Figure 9 – Property Eligibility by Incentive Track .....	18
Figure 10 – Property Eligibility by Reservation Status .....	19
Figure 11 – Overall Property Eligibility .....	20
Figure 12 – Property Eligibility by Reservation Status .....	20
Figure 13 – Application Status by Incentive Track.....	21
Figure 14 – Average System Size (kW) by Reservation Status.....	23
Figure 15 – Average System Size (kW) by IOU Territory .....	23
Figure 16 – Distribution of System Sizes (kW) .....	24
Figure 17 – Progress to 300 MW.....	25
Figure 18 – Percent of Program MW by Reservation Type .....	25
Figure 19 – Project Density and Location Visualizations .....	26
Figure 20 – Number of Completed and Planned Surveys by Category .....	30
Figure 21 – Number of Eligible Contractors Over Time .....	32
Figure 22 – Contractor Statistics.....	33
Figure 23 – Property Owner Engagement .....	35
Figure 24 – Job Trainees Located in DACs.....	41
Figure 25 – Projected Job Trainee Count and Metrics .....	41
Figure 26 – Track A Reservation Summary .....	43
Figure 27 – Standard TA Services Requested .....	43
Figure 28 – Share of DAC Properties by IOU Service Territory.....	53
Figure 29 – Share of Properties In and Out of DACs by IOU .....	53
Figure 30 – Regions with the Highest Concentrations of DAC Properties.....	54
Figure 31 – Share of SOMAH Application In/Out of DACs by IOU .....	55
Figure 32 – Market Research Summary Table .....	56



# 1. Executive Summary

In the third reporting period for SOMAH, the program continued to monitor the impacts of the COVID-19 public health crisis while engaging with stakeholders and participants virtually. Application data showed a shift of projected construction start dates from Q2 2020 to Q4 2020 and into 2021, primarily due to evolving schedules impacted by COVID-19. This period of performance for reporting also included the first incentive stepdown, with the new incentive rate effective July 1, 2020. The SOMAH program began accepting applications on July 1, 2019. At the close of 2020, all program territories had available funding and are accepting new applications for immediate review. Additional funds released for the first half of 2020 and 2016-19 true-ups, resulted in clearing of all waitlists. The program celebrated the first interconnected project and completed incentive payment in the PG&E territory, as well as the first two projects to complete the online bidding tool after going through upfront technical assistance. Marketing education and outreach (ME&O) efforts continued online with a focus on driving Track A projects to the program. The percentage of active applications located in disadvantaged communities<sup>1</sup> (DACs) increased from 27% to 31% in this reporting period, with DAC participation continuing as a focus of the SOMAH Program Administrator (SOMAH PA) into 2021. The SOMAH PA also began onboarding a fifth CBO partner focused on the Central Valley region, with planned efforts to kick off program work in Q1 2021. At the close of 2020, the SOMAH PA's Progress Payment Proposal was approved by Energy Division, allowing the program to offer a two-payment pathway that the industry and program participants have eagerly awaited.

## 1.1 COVID-19 Acknowledgement

The COVID-19 public health crisis, and the SOMAH PA's response, impacted numerous areas of the program. This report recognizes these impacts in conjunction with providing standard updates on key program areas. With the majority of 2020 affected by the impacts of the COVID-19 public health crisis, the SOMAH PA continues to acknowledge the impacts to SOMAH participants, stakeholders and the solar industry. While many of the impacts are not new with stay-at-home orders issued for much of the state in

<sup>1</sup> Disadvantaged communities for the SOMAH program are currently defined as census tracts scoring in the top 25% statewide on the [CalEnviroScreen 3.0 map](#). Properties located in one of 22 additional census tracts that are in the top 5% of pollution burden but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic data are also eligible.



December, the SOMAH PA understands that the industry will be affected for some time to come and continues to encourage participants to provide feedback on the barriers and impacts that they are facing. Despite these impacts, the program has continued to see projects progress with their design, construction and interconnection efforts. The SOMAH PA maintains a dedicated webpage, [CalSOMAH.org/COVID19](https://CalSOMAH.org/COVID19), to provide the most up-to-date program information and resources on this topic. The SOMAH PA remains committed to prioritizing health and safety during this time, while working to advance the goals of the SOMAH program and build a resilient California.

## 2. Background

The Solar on Multifamily Affordable Housing (SOMAH) program provides financial incentives for installing photovoltaic (PV) energy systems on multifamily affordable housing. The program is designed to deliver clean power and credits on energy bills to hundreds of thousands of California's affordable housing residents. The program was created by California Assembly Bill (AB) 693 (Stats. 2015, Ch. 582), authored by now state Senator (D-District 05), then Assemblymember Susan Talamantes Eggman (D-Stockton) and signed by Governor Jerry Brown in 2015. Senate Bill (SB) 92 (Stats. 2017, Ch. 26), adopted with the 2017-18 State Budget, further clarified the budget for the program. Decision (D.)17-12-022 (effective Dec. 14, 2017) implemented AB 693 and changed the name of the program to the Solar on Multifamily Affordable Housing (SOMAH) program to distinguish it from other state clean energy and low-income solar programs. D.17-12-022 established the program's budget, incentive structure and eligibility policies, among other items.

The SOMAH program serves utility and community choice aggregator customers in the territories of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Liberty Utilities Company and PacifiCorp. Funded through greenhouse gas (GHG) allowance auction proceeds, SOMAH has a program budget of up to \$100 million annually for 10 years and an overall target to install at least 300 megawatts (MW) of generating capacity by 2030.

The program is determined to be transparent and accountable to the communities it serves. It is administered by a team of nonprofit organizations that provide a host of no-cost services to maximize participation and community benefit. These services include comprehensive technical assistance for property owners and contractors, tenant education resources and job training opportunities. A community advisory council provides input into program implementation and helps ensure the program maximizes benefits to the communities it is designed to serve. The SOMAH program is jointly



administered by the Association for Energy Affordability, Center for Sustainable Energy® and GRID Alternatives, in collaboration with the California Housing Partnership and Rising Sun Center for Opportunity. The SOMAH program is overseen by the California Public Utilities Commission (CPUC).

## 2.1 Application Pathways: Track A and Track B

The SOMAH program is designed to accommodate participation at varying stages of a solar PV installation, ranging from initial property owner engagement and assessment of a property's solar installation capacity to projects whose contractor has already been selected or whose installations are underway or recently completed. There are two tracks to apply for a SOMAH incentive: Track A and Track B. The SOMAH PA designed the program with two incentive track choices to tailor the user experience based on the stage of a project, i.e., whether the program participant is just starting their journey with going solar, has a shovel-ready project or has recently completed the installation. Both tracks provide fixed, capacity-based incentives for qualifying solar energy systems, using the Expected Performance Based Buydown (EPBB)<sup>2</sup> methodology.

Track A is designed for property owners who receive direct program marketing and outreach from the SOMAH PA and its network of community-based organization (CBO) partners. Track A provides upfront technical assistance (TA) services for property owners to supply them with a well-rounded understanding of their property's energy needs and the educational, technical and financial resources that are available to facilitate valuable energy efficiency upgrades and a solar installation. Participants that select Track A will have their incentive funding earmarked for the duration of the three-month upfront TA period, prior to a reservation request. Track A participants typically do not have an identified contractor and are guided through a multiple bid process to select an eligible solar contractor for their project.

Track B is designed for property owners who receive direct program marketing and outreach from an eligible contractor, project developer or similar entity. Projects in this track have already identified an eligible solar contractor who has already performed or will provide the client assessment and design services that may include a solar site assessment, initial design, financing options review, contract review, etc. Projects that select Track B are not eligible for upfront TA and may waive the requirement to

<sup>2</sup> EPBB incentives are based on the system's capacity and design, which provide an estimate of the system's future performance.



participate in the multiple bid process by submitting the Multiple Bid Waiver with the reservation request package. Instead of upfront TA, Track B projects are eligible for standard TA, which is further described in Section 3.4.

For Track A and B projects, incentive funding will be reserved for 18 months based on the date the Reservation Approval Notice is issued.

The following figure shows the application steps for Track A and Track B.

**Figure 1 – Track A and Track B Application Steps**



## 2.2 Eligibility Options: Qualification Option A — Low-Income and Qualification Option B — Disadvantaged Communities

Regardless of the application track selected, properties can qualify for the SOMAH program in one or both ways, known as Qualification Option A and Qualification Option B. A property may be eligible for SOMAH by meeting the requirements of Option A, Option B or both. All properties must be at least five units and meet the definition of deed-restricted, affordable housing in P.U. Code 2852(A)(3)(a)(i) and also meet Qualification Option A or B. Qualification Option A refers to properties in which at least 80% of the units are reserved for households at or below 60% of the area median income (AMI); and Qualification Option B refers to properties that are located in a disadvantaged community (DAC) as identified by CalEnviroScreen and CalEPA. Section 3.1.1, Applications and Incentive Statistics, further elaborates on each type of the qualification options for the SOMAH program.



## 2.3 Program Budget

SOMAH has a program budget of up to \$100 million annually, with at least 90% of the funds allocated to incentives and up to 10% allocated to the administrative budget. To ensure transparency for program stakeholders, the SOMAH PA compiles and submits a Semiannual Expense Report (SAER). The SAER tracks expenditures by category, totaling program incentives and administration expenses incurred by the SOMAH PA, CPUC Energy Division (ED) and the investor-owned utilities (IOUs). The SAER is posted twice a year to the California Distributed Generation Statistics [website](#) in conjunction with this Semiannual Progress Report.

### 2.3.1 Program Administrative Budget

The administrative budget is shared by the SOMAH PA, the CPUC ED and the IOUs. The SOMAH PA tracks the program expenses in four main categories: SOMAH PA Admin; Marketing, Education & Outreach (ME&O); Technical Assistance; and Workforce Development. Figure 2 provides a snapshot from the SAER and outlines total program administrative expenditures through December 31, 2020.

**Figure 2 – Total Program Administrative Expenditures by Category**

Category	
Investor-owned Utility (IOU) Expenses	\$3,042,432.34
SOMAH California Public Utilities Commission (CPUC) Expenditures	\$155,338.75
SOMAH Marketing, Education & Outreach (ME&O)	\$4,251,707.39
SOMAH Program Admin	\$9,265,047.82
SOMAH Technical Assistance	\$419,534.89
SOMAH Workforce Development	\$801,403.39
Grand Total	\$17,935,464.58

More detailed expenditure information can be found at [https://www.californiadgstats.ca.gov/programs/#\\_subsection\\_17](https://www.californiadgstats.ca.gov/programs/#_subsection_17).

### 2.3.2 Program Incentive Budget

The SOMAH PA publishes updated program incentive budget information for each IOU territory to the California Distributed Generation Statistics [website](#) on a weekly basis. Because each IOU territory's annual incentive budget varies based on their specific GHG allowance auction proceeds, the SOMAH PA maintains five individual reservation queues and up to five waitlist queues. Collections for each funding cycle are expected to be available in Q1 (PG&E, SCE and SDG&E) and Q2 (Liberty and PacifiCorp). The



funds for each utility territory may be released at different times, with the collections based on each utility's Energy Resource Recovery Account (ERRA) or Energy Cost Adjustment Clause (ECAC). PacifiCorp funding will be released quarterly versus the annual lump sum release of the other territories.

In Q3 2020, the SOMAH PA refreshed the format of [Table 2: Cumulative Program Budget](#) on California Distributed Generation Statistics with clarification of the annual budget years/collection period and an additional column for the funds allocated through the under-collection true-up process where the IOUs were directed to set aside additional funding in their 2020 ERRA and ECAC proceedings to make up for under-collections in the 2016-2019 program years. A summary of funding releases for the second half of 2020 include the following territories and dates: Liberty (7/14 and 10/29); PG&E, SCE and SDG&E (7/28); and PacifiCorp (7/24). Figure 3 summarizes the committed and remaining budget for the SOMAH program.



**Figure 3 – Project Capacity and Budget**

		Waitlist		Earmarked		Pending Reservation		Reserved		Completed		Application Totals		Total Budget (\$)	Remaining Budget (\$)
		Capacity (MW)	Budget (\$)	Capacity (MW)	Budget (\$)	Capacity (MW)	Budget (\$)	Capacity (MW)	Budget (\$)	Capacity (MW)	Budget (\$)	Capacity (MW)	Budget (\$)		
PG&E	Track A	0	0	0	0	0.118	345,990	0	0	0	0	0.118	345,990	123,131,542	45,830,651
	Track B	0	0	0	0	18.730	40,953,267	16.094	35,875,396	0.050	126,238	34.874	76,954,901		
	Total	0	0	0	0	18.848	41,299,257	16.094	35,875,396	0.050	126,238	34.992	77,300,891		
SCE	Track A	0	0	0	0	0	0	0.294	850,901	0	0	0.294	850,901	145,204,459	91,944,384
	Track B	0	0	0	0	10.574	23,992,773	12.914	28,416,401	0	0	23.488	52,409,174		
	Total	0	0	0	0	10.574	23,992,773	13.208	29,267,302	0	0	23.782	53,260,075		
SDG&E	Track A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	34,774,636	6,896,675
	Track B	0	0	0	0	8.209	19,060,783	4.053	8,817,178	0	0	12.262	27,877,961		
	Total	0	0	0	0	8.209	19,060,783	4.053	8,817,178	0	0	12.262	27,877,961		
PacifiCorp	Track A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	4,090,312	3,806,819
	Track B	0	0	0	0	0.149	283,493	0	0	0	0	0.149	283,493		
	Total	0	0	0	0	0.149	283,493	0	0	0	0	0.149	283,493		
Liberty Utilities	Track A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	1,273,350	948,545
	Track B	0	0	0	0	0.169	324,805	0	0	0	0	0.169	324,805		
	Total	0	0	0	0	0.169	324,805	0	0	0	0	0.169	324,805		
TOTAL	Track A	0	0	0	0	0.118	345,990	0.294	850,901	0	0	0.412	1,196,891	308,474,299	149,427,074
	Track B	0	0	0	0	37.831	84,615,121	33.061	73,235,213	0.050	126,238	70.942	157,850,334		
	Total	0	0	0	0	37.949	84,961,111	33.355	74,086,114	0.050	126,238	71.354	159,047,225		



**Figure 4 – Cumulative Program Budget**

	2016 Budget (\$)	2017 Budget (\$)	2018 Budget (\$)	2019 Budget (\$)	Under- Collections True-up (\$)	2020 Budget (\$)	Application Totals (\$)	Total Budget (\$)	Remaining Budget (\$)
PG&E	1,740,992	4,359,110	39,330,000	33,963,300	27,616,537	16,121,603	77,300,891	123,131,542	45,830,651
SCE	2,733,251	4,536,250	35,213,205	36,768,272	45,542,591	20,410,890	53,260,075	145,204,459	91,944,384
SDG&E	0	0	9,270,000	9,104,076	11,343,785	5,056,775	27,877,961	34,774,636	6,896,675
PacifiCorp	422,443	961,291	1,000,512	1,150,528	0	546,538	283,493	4,090,312	3,806,819
Liberty Utilities	132,440	258,329	314,706	419,517	0	148,358	324,805	1,273,350	948,545
<b>TOTAL</b>	<b>5,029,126</b>	<b>10,114,980</b>	<b>84,127,909</b>	<b>81,405,693</b>	<b>84,502,913</b>	<b>42,284,164</b>	<b>159,047,225</b>	<b>308,474,299</b>	<b>149,427,074</b>

Figure 4 summarizes the program dollars collected by fiscal year to date and identifies application totals and available program funds.



### 3. Program Progress — Key Performance Areas

The overall SOMAH program budget is allocated between incentive budgets and administrative budgets. The SOMAH PA administrative budget is further divided into four categories: Program Administration, ME&O, Workforce Development and Technical Assistance. The following sections describe progress to date and notable metrics in each of the four categories.

#### 3.1 Program Administration

The SOMAH program opened on July 1, 2019, which included the opening of the online application database (PowerClerk) for application submissions, launching the online bidding tool and commencing the publication of program statistics through the SOMAH Incentive Budget Report and SOMAH Working Data Set on the California Distributed Generation Statistics [website](#). The first iteration of the Semiannual Expense Report (SAER) was filed on July 1, 2019 and the Semiannual Progress Report (SAPR) on January 31, 2020.

##### 3.1.1 Applications and Incentive Statistics

With the new funding made available in July 2020 for PG&E, SCE and SDG&E, the SOMAH PA was able to clear out the remaining waitlists of 33 applications for PG&E and SDG&E, moving all applications from “Waitlist” status to “Reservation Review” in the PowerClerk database. Pent up demand for SDG&E funding led to another waitlist being established for the territory in under two weeks; however, as program funds continued to become available throughout Q3 and Q4, all projects in SDG&E territory were able to be moved from the waitlist into review. The SDG&E waitlist remained open to new waitlist application submissions with final projects moved off the waitlist in December, removing the waitlist for SDG&E once again. As of the submittal of this report, there are currently no waitlisted projects for any of the SOMAH-participating IOUs.

**Figure 5 – Application Status by IOU Territory**

Program	Active	Complete/ Incentive Paid	Waitlist	Canceled/ Withdrawn
PG&E	209	1	0	42
SCE	126	0	0	39
SDG&E	67	0	0	13
Liberty Utility	2	0	0	0
PacifiCorp	1	0	0	0

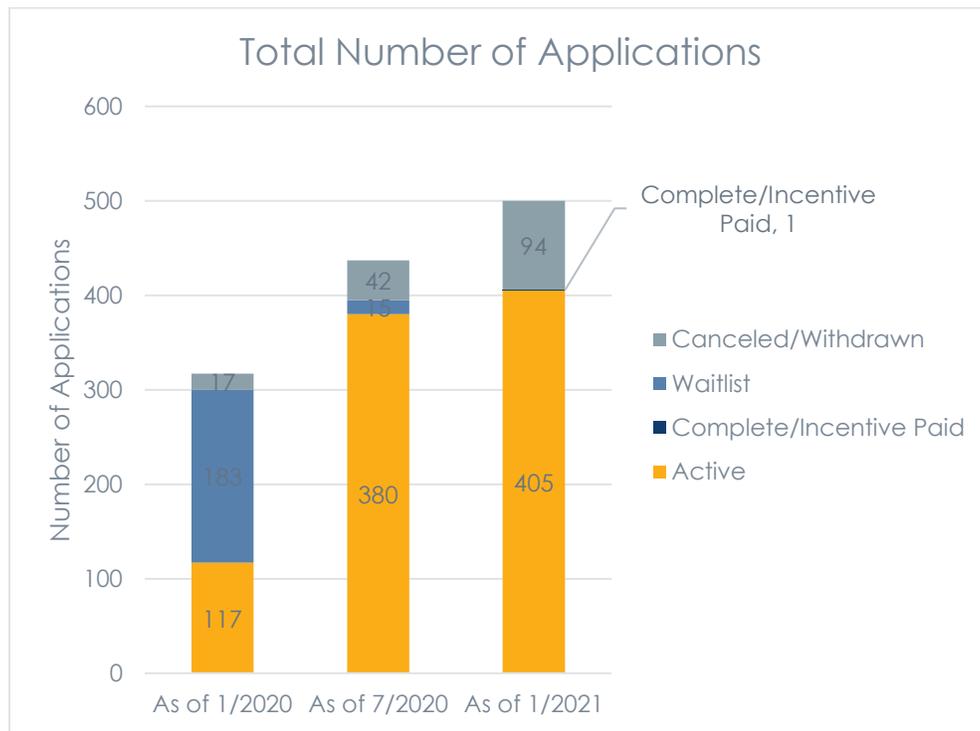


When funding is exhausted for a specific IOU territory, a waitlist is established, and projects are added to it until more funding becomes available. Projects are then moved off the waitlist in the order they are received. If applicable, applicants can review the status of their waitlisted application(s) and their position on the waitlist through weekly updates on CalSOMAH.org.

There are two main ways for previously allocated funds to become available for other projects. First, a project may be canceled by the SOMAH PA due to missed deadlines or not meeting program eligibility. Second, incentive funds may become available through the course of application review. For example, adjustments made to system size after receiving consumption data from the IOU will affect the reserved incentive amount. The SOMAH PA has observed that the majority of projects will reduce their system size after receiving the consumption data during the Reservation Request Milestone, and therefore the reserved incentive will be reduced. These previously allocated funds are then applied to waitlisted projects (when applicable) through an ongoing reconciliation process by the SOMAH PA. Similarly, the SOMAH PA maintains a buffer in each territory's budget to accommodate potential increases in system size and incentive amount as a result of consumption data from the IOU, anticipated future load additions, solar sizing tool recommendations or other reasons. Without an easy method for applicants to retrieve the tenant consumption data before the program application is submitted for review, additional steps are completed by the SOMAH PA and the applicant, which typically results in a longer Reservation Request review timeline.



**Figure 6 – Cumulative Applications Received**



While there was a large influx of applications prior to the July 2020 incentive stepdown,<sup>3</sup> the program saw the application submissions level off, until a group of end-of-year submissions totaling 22 new applications in PG&E and SCE territories were received. Between July and December 2020, the SOMAH program received 63 new applications. No new applications were received for PacifiCorp or Liberty. The program also saw an increase in canceled and withdrawn applications, largely voluntary withdrawals. In response to recommendations from the [Phase 1 Program Evaluation Report](#), the SOMAH PA has implemented data fields for tracking cancellation reasons. The SOMAH PA hopes to use the information to support follow up with property owners on projects that were not feasible or interested at this time but still eligible for the program. From conversations with contractors and property owners throughout Q3 and Q4 2020, it was

<sup>3</sup> SOMAH incentive levels are subject to predetermined reductions on an annual basis. Annually, incentive levels will decrease either by 5% or by the annual percent decline in residential solar costs as reflected by NREL reports, whichever is less, per D.17-12-022.



clear that the priority was to maintain their current portfolio of applications while weathering the widespread challenges of the ongoing COVID-19 public health crisis.

Of the data points collected at the Reservation Request (RR) Milestone, the applicant is required to enter the project's construction start date or projected construction start date. At the start of each subsequent milestone, Energy Efficiency Compliance Milestone, Proof of Project Milestone and Incentive Claim Milestone, applicants are prompted to report if construction has started or update the projected construction start date if not. Below is a table of the construction timeline information reported in applications thus far.

**Figure 7 – Construction Timeline Insights**

Date	Construction has Commenced	Projected Construction Start Date
2019	2	0
Q1 2020	1	2
Q2 2020	0	54
Q3 2020	2	35
Q4 2020	0	210
Q1 2021	0	66
Q2 2021	0	10
Q3 2021	0	20
Q4 2021	0	1
Q1 2022	0	1

During the previous reporting period, projects were expecting to start construction primarily in Q2 2020. The projections have since shifted to the bulk of estimated construction starting in Q4 2020, with additional forecasts into 2021. The SOMAH PA expects that projected construction start dates will continue to fluctuate into 2021 as projects progress and are better able to forecast construction timelines with more certainty. Additionally, it is likely that the public health crisis will have impacts on the Q4 construction plans that may have been forecasted prior to the resurgence of COVID-19 in the state of California and across the nation. Updated construction start dates will continue to post as projects continue to progress to future milestones through their 18-month reservation. Updated information will continue to be made available in subsequent progress reports.



A major program achievement for applications during this reporting period is the first project to complete utility interconnection and receive incentive payment. PGE-SOMAH-00101 progressed through its Energy Efficiency Compliance Milestone and Proof of Project Milestone in July and August, entering its Incentive Claim Milestone in September 2020. The on-site inspection was completed in October, with final Incentive Claim Approval after IOU Approval in November. The PA completed the invoicing and payment process in December, marking the first completed project by end of 2020. This first completed project in the city of Templeton represents a 50.49-kW system with 11.12% of the generation allocated to the common area and a tenant allocation of 88.88% for a total of 30 units on site.

**Figure 8 – Applications by Incentive Track**

Assigned Incentive Track	Active	Complete/ Incentive Paid	Waitlist	Canceled/ Withdrawn
Track A	4	0	0	8
Track B	401	1	0	86

Four new Track A projects were submitted for upfront technical assistance (TA) during this reporting period. Technical assistance and the Track A projects are further discussed in Section 3.4, and the majority of applications received continue to be Track B projects. The first two projects to go through upfront TA and use the online bidding tool were completed in Q3 and Q4 2020 as well. Through ME&O efforts to property owners, the SOMAH PA is working on maintaining a pipeline of potential Track A projects and will continue targeted efforts in 2021 to increase Track A participation. Track A projects provide an opportunity to increase the diversity of eligible property owners participating in the program and provide an opportunity for smaller affordable housing providers that may not normally engage with the program without the benefit of upfront TA.

Along with the incentive track type (Track A or Track B) differentiating applications, the eligibility pathway for how the project qualifies for SOMAH is another key distinction for an application. Projects must satisfy one or both of the following options.

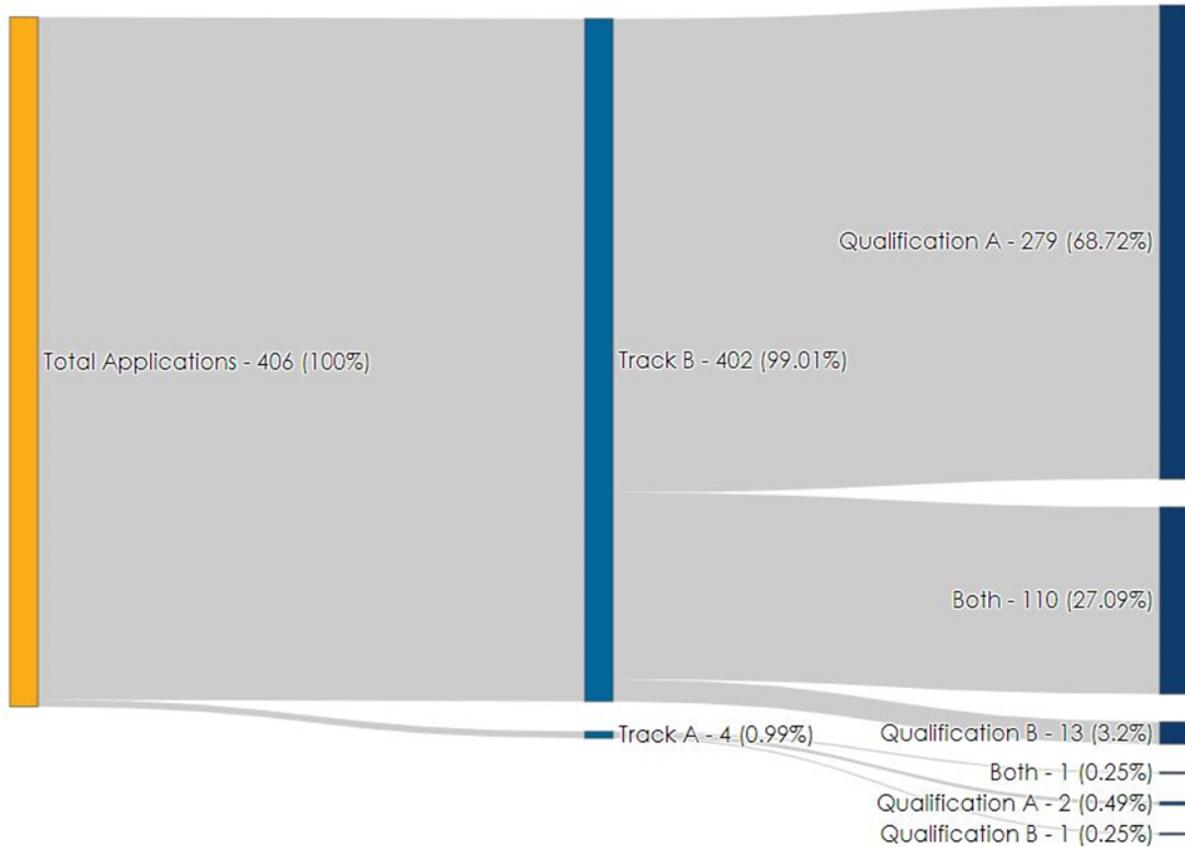
- Qualification Option A: 80% of property residents have incomes at or below 60% of the area median income as determined by the Department of Housing and Community Development.
- Qualification Option B: The property is located in a disadvantaged community (DAC) as identified by the California Environmental Protection Agency.



- Both: The property meets the requirement of 80% of property residents having incomes at or below 60% of the area median income and is located in a DAC.

Figure 9 shows the breakdown between application track and eligibility pathways during this period of performance.

**Figure 9 – Property Eligibility by Incentive Track**



Of the 406 active applications<sup>4</sup> received, ~69% qualified for the program through Qualification Option A, ~4% qualified for the program through Qualification Option B, and ~27% qualified for the program through both Qualification Option A and Qualification Option B. DAC project participation has hovered in the 25-30% range

<sup>4</sup> Active applications are those that have not been canceled or withdrawn. This figure includes waitlisted applications as well, which have not had their project information vetted, including their property eligibility qualification. Waitlisted applications are held in the waitlist status (categorized as Pending Reservation Approval) and reviewed once funding becomes available to move them off the waitlist.



since the program opened in July 2019. The PA continues to prioritize DAC participation and has been in close correspondence with Commissioner Martha Guzman Aceves' office regarding communities served by the SOMAH program and the share of projects located in DACs. Most recently, the SOMAH PA provided the Commissioner's office a memo describing potential options for improving participation by eligible properties located in DACs, which is further discussed in Section 4.2.3, CPUC DAC Participation Memo. Figure 10 further breaks down the property eligibility statuses by count and percentage to highlight the number of DAC qualifying properties.<sup>5</sup>

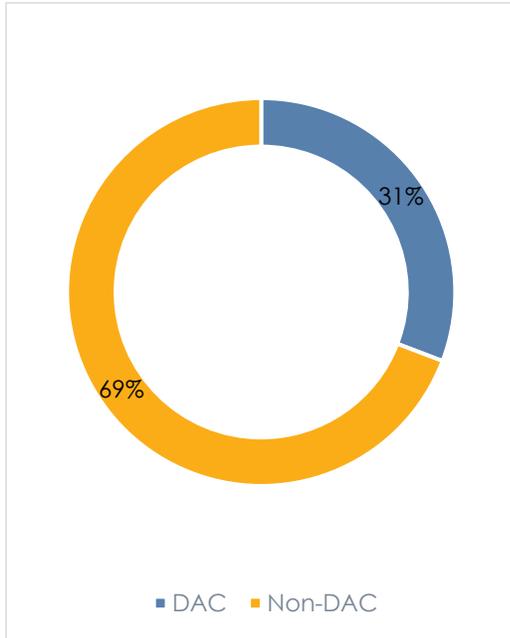
**Figure 10 – Property Eligibility by Reservation Status**

Property Eligibility	Pending Reservation Approval	Reservation Approval Received	Complete/ Incentive Paid	Waitlist	Canceled/ Withdrawn
Option A - 80% of property residents have incomes at or below 60% of the area median income as determined by the Department of Housing and Community Development.	151	129	1	0	76
Both Option A and B	56	55	0	0	10
Option B - The property is located in a disadvantaged community as identified by the California Environmental Protection Agency.	8	6	0	0	8

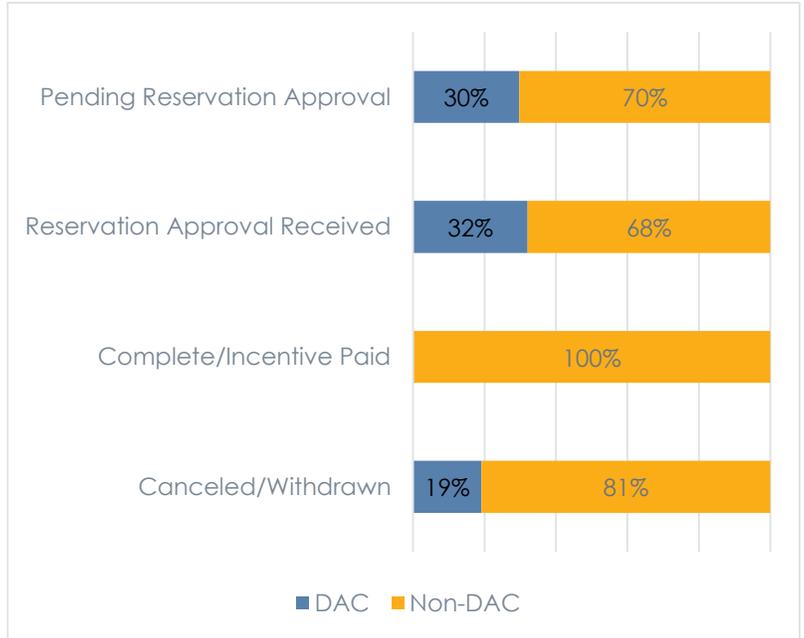
<sup>5</sup> DACs are not distributed evenly across the IOU territories. The percentage of census tracts that are DACs in each IOU territory varies, along with the overlap of eligible properties in a DAC by each IOU territory. The PA does not know of any properties located in DACs in Liberty Utility or PacifiCorp territories.



**Figure 11 – Overall Property Eligibility**



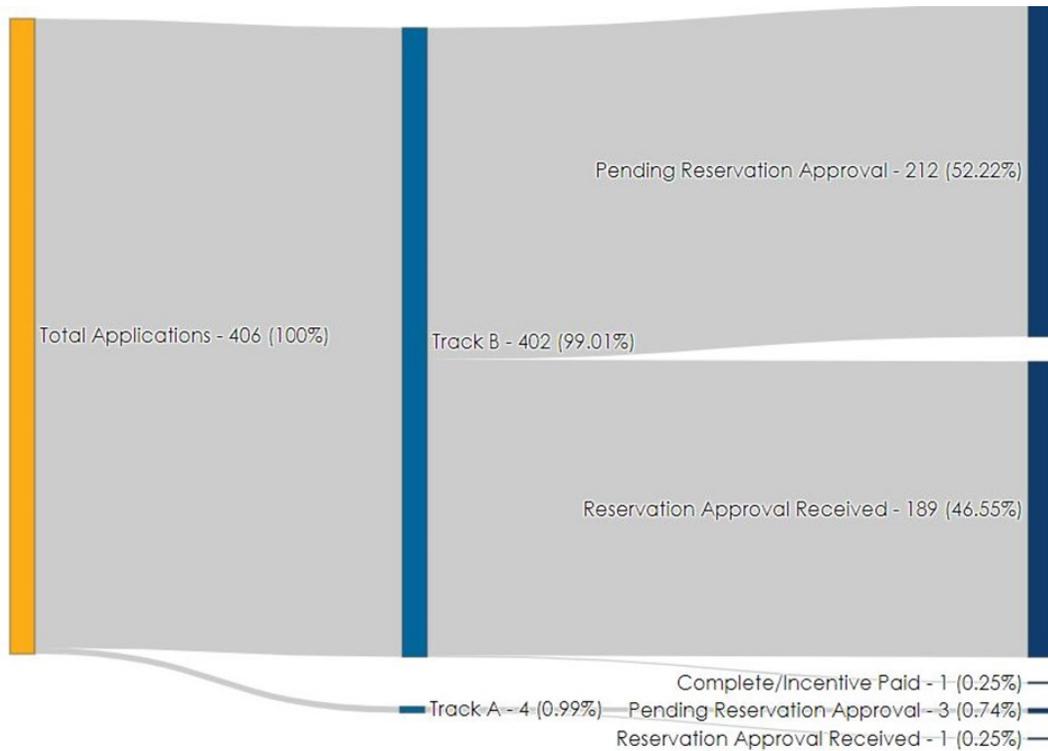
**Figure 12 – Property Eligibility by Reservation Status**



The Reservation Request Milestone is the first step of the application process for Track B projects, which vets the project's eligibility to participate in the program. The reservation request package is a robust and distinguishable milestone to complete for all projects, with up to eight required documents and an application deposit before achieving reservation approval. The SOMAH PA maintained a strong focus on application review progress during this reporting period with the number of projects with reservation approvals increasing from 37 to 191. Additionally, 48 applications are very close to completing the Reservation Request Milestone, with their document review complete but currently pending application deposit receipt before final Reservation Approval. The electronic payment options for application deposits continues to be a very popular option for participants, which is also an asset for the SOMAH PA to streamline the application deposit processing as the final step in processing Reservation Approvals.

Not only is Reservation Approval a significant achievement for an application, it also signals an important handoff of information between the SOMAH PA and IOUs. Based on mandates in the CPUC's Final Decision, the SOMAH PA sends monthly reports to the IOUs for Energy Savings Assistance Program (ESA) referrals of projects with Reservation Approval for each month, as well as a rolling list of all projects with approved reservations.

**Figure 13 – Application Status by Incentive Track**



See Appendix A for a full list of application statuses and descriptions.

Milestone advancement continues to be an important part of the progress made for applications. In the third reporting period for SOMAH, the program now has applications in all stages of the application, construction and completion process representing each of the program's four-milestone application process. With application processing efforts yielding 154 new projects advancing to Approved Reservation status, this reporting period held the most application activity across milestones thus far. The Reservation Request and Energy Efficiency Compliance Milestones are important steps in determining project eligibility and the eligible system size, as they consider consumption history and available energy efficiency upgrades. Proof of Project Milestone and Incentive Claim Milestone provide information on the contracted and executed system as well as providing proof of compliance with the program's Job Training and Tenant Education requirements.

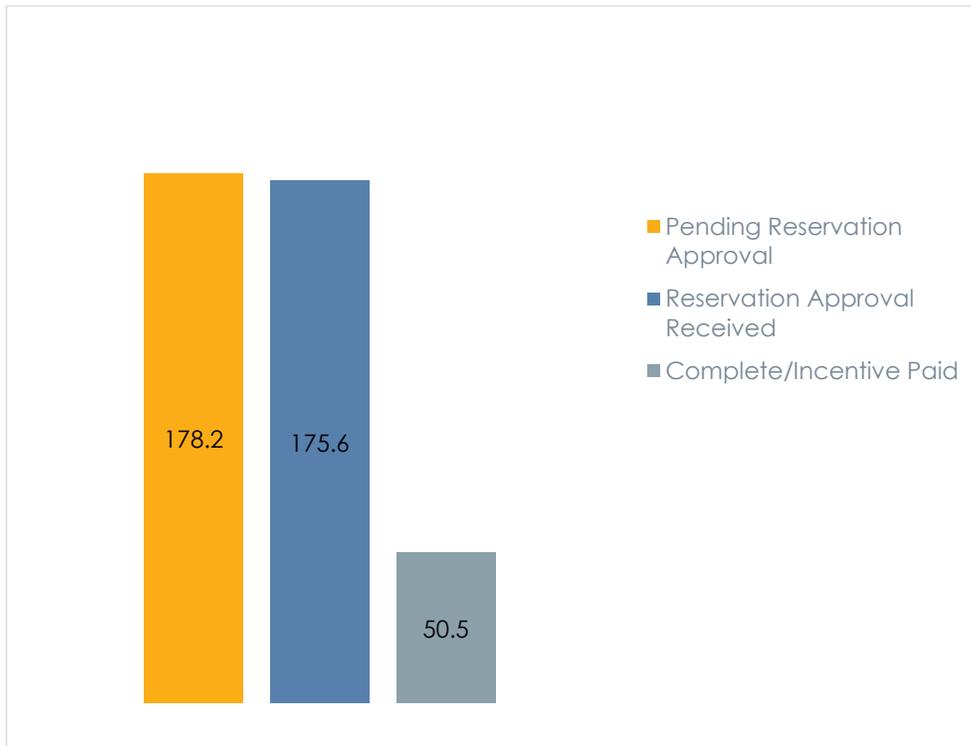
To accommodate challenges with completing program requirements due to COVID-19 restrictions, the SOMAH PA introduced an Energy Efficiency Compliance Milestone



(EECM) Postponement option in early July. The EECM Postponement option is a temporary program response allowing projects that have received Reservation Approval to postpone submitting their EECM documentation up to submission of the Incentive Claim Milestone. This option was developed due to challenges with property restrictions creating barriers to complete the whole-building walkthrough audit and other on-site activities. The EECM Postponement option is a temporary program response but was widely used to keep projects active in the program and progressing further. The SOAMH PA will report back with additional information on the frequency that this option was used and when the subsequent documentation was submitted in future reports.

In this reporting period, two contractors have progressed a portion of their application portfolios to the Proof of Project Milestone (PPM) stage. The SOMAH PA worked closely with both contracting companies to ensure compliance with the program requirements for the contract documentation submitted. As more projects progress to PPM, the SOMAH PA hopes to gain more information about subcontractors that some projects are utilizing. This subcontractor information would help provide further insight on the diversity of contractors engaging in and benefiting from the program. No other projects aside from the first completed project, PGE-SOMAH-101, have made it to the final milestone for Incentive Claim. Further information on completed projects and Incentive Claim is forthcoming in future reports as applications continue to progress through their 18-month reservations.

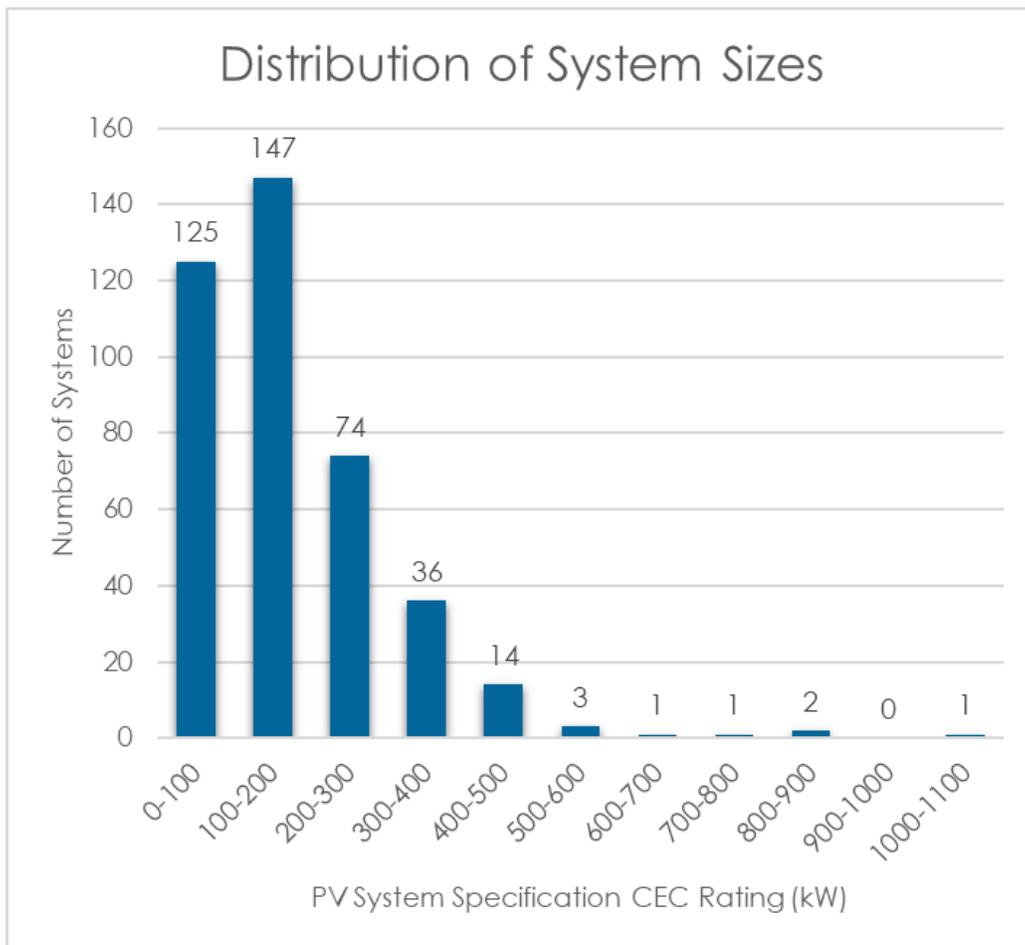
**Figure 14 – Average System Size (kW) by Reservation Status**



**Figure 15 – Average System Size (kW) by IOU Territory**

Program	Pending Reservation Approval	Reservation Approval Received	Complete/Incentive Paid	Waitlist	Canceled/Withdrawn
PG&E	171.3	162.6	50.5	0.0	236.4
SCE	199.5	186.0	0.0	0.0	223.2
SDG&E	174.7	202.7	0.0	0.0	286.0
Liberty Utility	84.3	0.0	0.0	0.0	0.0
PacifiCorp	148.6	0.0	0.0	0.0	0.0

**Figure 16 – Distribution of System Sizes (kW)**

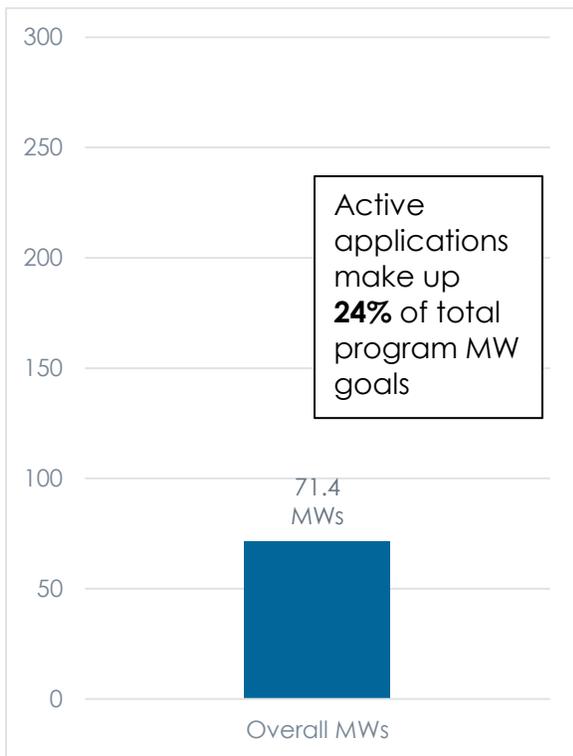


Validating each project's system size with aggregated annual electrical consumption history from IOU data requests is a key step of the reservation request, prior to approval. The Figures 17 and 18 outline system size statistics for the average and largest projects across the IOU territories. From the approved reservations, data shows that projects reduce their system size by an average of 30% from initial submission. Of the projects

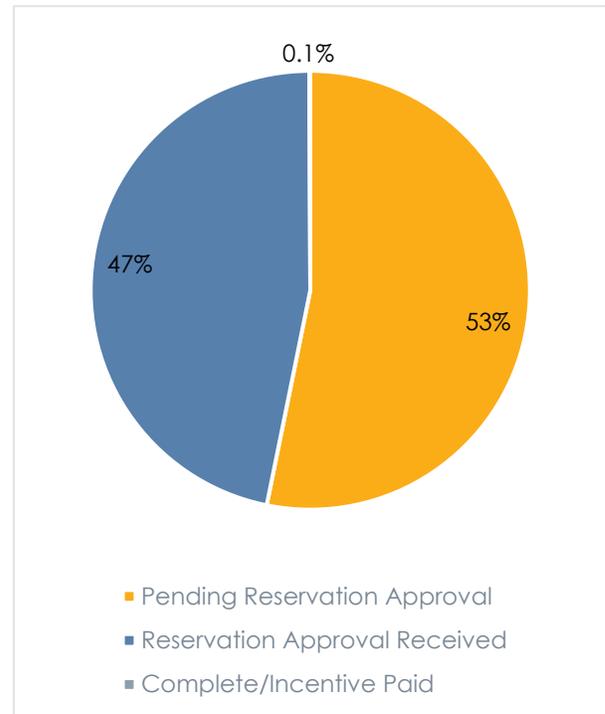


submitted thus far, the average system cost is \$4.14/watt<sup>6</sup> with a total expected aggregate annual output of 123,990,249 kWh.<sup>7</sup>

**Figure 17 – Progress to 300 MW**



**Figure 18 – Percent of Program MW by Reservation Type**



<sup>6</sup> Project costs are not considered verified until review of the installation contract and associated costs at the Proof of Project Milestone. The numbers used in this average are estimates reported for the projects currently in queue and are likely to fluctuate in future reporting periods.

<sup>7</sup> Expected aggregated annual output is an estimate based off the PV equipment and system configuration specifications currently listed for all active applications in PowerClerk. This figure is subject to change based on updated system designs for projects in queue. System components and configuration are not verified until the on-site inspection at the Incentive Claim Milestone, which directly impact the expected output of the PV system.

**Figure 19 – Project Density and Location Visualizations**

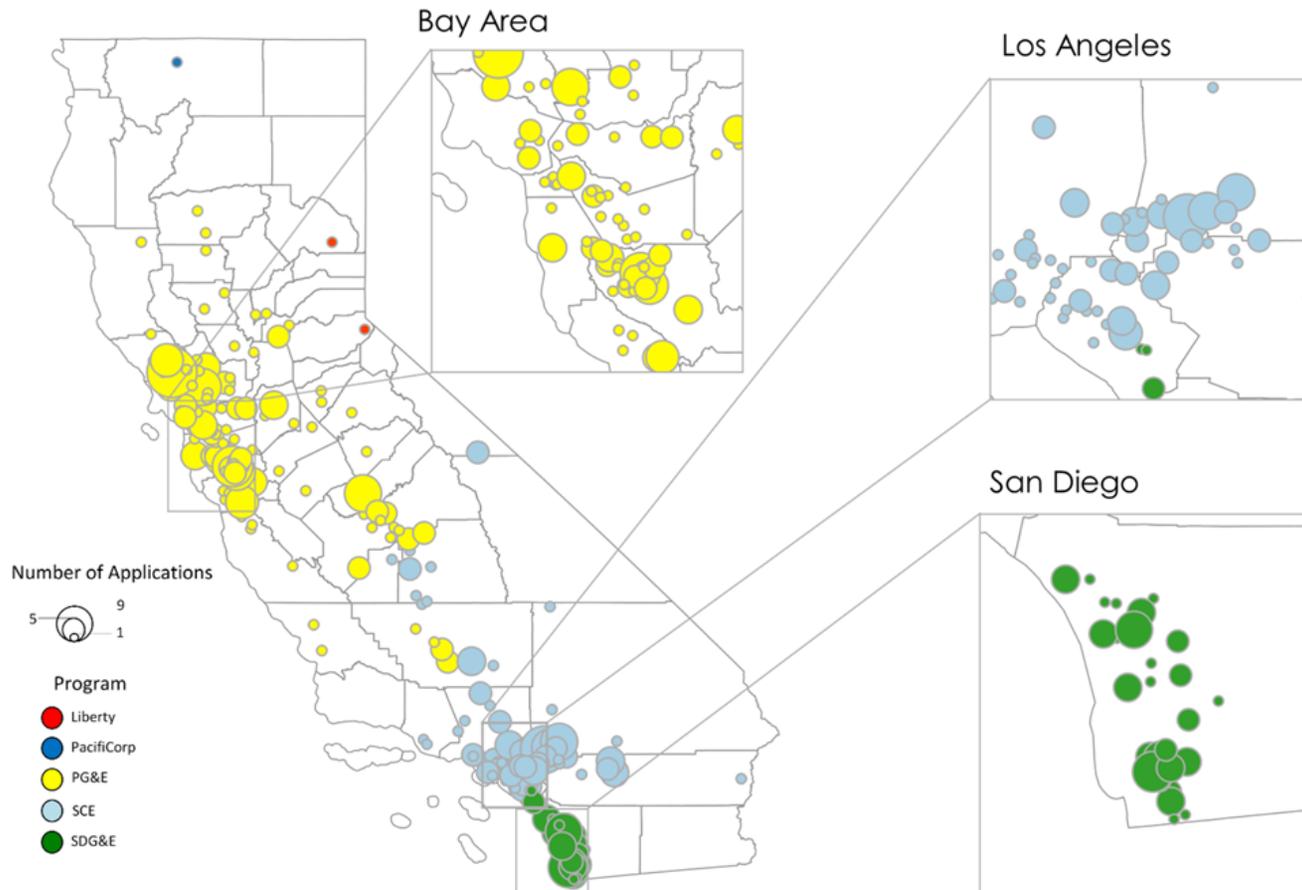


Figure 19 shows the geographic distribution of property locations for applications received thus far. For additional detail, a closer view is provided for areas of higher density in the San Francisco Bay Area, San Diego and the greater Los Angeles area.



### 3.1.2 Online Bidding Tool

The online bidding tool is a platform used to connect property owners with eligible SOMAH contractors, providing an apples-to-apples bid comparison. The platform is available for all SOMAH participants and supports the multiple bid requirement for Track A projects. The online bidding tool maintains a repository of eligible SOMAH contractors that have completed the Contractor Eligibility Training webinar and registered their primary contact information with the SOMAH PA. SOMAH contractors can use the online platform to gain access to job leads, respond to project bid requests and demonstrate program compliance.

The online bidding tool serves three distinct functions. First, it allows the host customer to indicate their interest in receiving a bid from three contractors of their choice. This places the onus on the customer to do basic research on a contractor ahead of time, such as researching reviews. Then, after the customer's selection of bidders, the tool notifies the SOMAH-eligible contractors, who then get in touch to begin the process of building a site-specific proposal. Finally, once all three contractors have completed proposals, the tool aggregates basic information about the proposal into a single user interface, which allows the host customer to compare topline proposal information including project cost, size, estimated date of completion and ownership type. The online bidding tool integrates with SOMAH's Project Bid Form, the eligible format to meet the multiple bid requirement. Whereas contractors have unique proposal generation tools and layouts with different underlying assumptions, SOMAH's requirement of a standardized bidding form harmonizes the detailed elements of a proposal into a consistent format containing objective and verifiable information.

In Q3 and Q4 2020, the first two host customer bid requests were completed with bid selection through the online bidding tool. Both projects leveraged the online bidding tool to meet the multiple bid requirement for Track A. For clarity and an improved user experience, the SOAMH PA updated the bidding tool to include additional help text and a warning message before bid request submission. Also, an additional documentation upload field was added to allow property owners to include a copy of their solar feasibility assessment from upfront technical assistance. The SOMAH PA looks forward to reporting tool usage metrics and customer experience information in subsequent Semiannual Progress Reports when data is available in aggregate.



### 3.1.3 California Distributed Generation Statistics

The SOMAH Working Data Set, which reports on all applications received for the program across the five utility territories, is updated weekly on the California Distributed Generation Statistics [website](#). The website (previously named California Solar Statistics) has been a valuable tool for customer-sited solar projects since its inception under the auspices of the California Solar Initiative. The report includes data associated with each waitlisted, pending, installed, withdrawn and/or canceled projects. Reported data includes, but is not limited to, application data, contractor information, incentive amounts and solar PV system cost and technical specifications. All personally identifiable information is scrubbed from the data set to ensure customer privacy. In October 2020, an additional resource tab was added to the “Read Me” key for the working data set. The resource includes a summary table of fields added and/or removed from the working data set, as well as the effective date, for further transparency and ease of use to stakeholders accessing the data set.

The working data set continues to be a frequented resource for program stakeholders and participants to glean insights on program progress and trends. Program data from the working data set also populates data visualizations on the [SOMAH Statistics and Chart](#) page of California Distributed Generation Statistics. Seven charts and graphs are currently displayed on the page. The SOMAH PA is preparing to release four to six additional charts and graphs as projects complete installation and interconnection in 2021. Examples of these new charts and graphs include capacity installed, size of installed systems, average project costs and type of work performed by trainees. Section 4, Program Planning and Development further elaborates on additional public reporting and transparency measures of the SOMAH program.

## 3.2 Marketing Education and Outreach

The SOMAH program's marketing, education and outreach (ME&O) efforts are guided by an annual SOMAH Marketing, Education and Outreach Plan. However, 2020 was full of unexpected events that required the SOMAH PA to shift some of its ME&O tactics and strategies to support program participants and respond to frequently changing circumstances. The effects of the global health pandemic, widespread protests against racial injustice and a devastating California wildfire season impacted all program participants and were at the forefront of the SOMAH PA's perspective this year.

The SOMAH PA adapted its marketing messaging and tactics, recognizing that program audiences had shifting priorities and needs. Low-income and underserved communities continue to be disproportionately impacted by the events that took place in 2020, and the SOMAH PA views the program as an important tool for economic



recovery as well as a method for improving resiliency in communities across California. The SOMAH PA strived to ensure that stakeholders had informational resources during this time and relied heavily on community-based organization (CBO) partners to help shape this messaging. SOMAH's CBO partners have also worked in their respective communities to amplify communications regarding COVID-19, safety, disaster preparedness and economic recovery.

Given the shifted focus and priorities of many program participants, the SOMAH PA concentrated on providing resources about program impacts and temporary changes. This included information on how application timelines may have been impacted, job site safety and programmatic changes made in order to maintain the current projects in the pipeline and ensure projects are moving forward. The SOMAH PA continues to update [CalSOMAH.org/COVID19](https://CalSOMAH.org/COVID19), a dedicated webpage to provide relevant resources to program participants and communicate any temporary program changes in response to the pandemic. On July 22, 2020, the SOMAH PA partnered with CalOSHA to host a webinar that outlined safety protocols for contractors, property owners and job trainees.

All ME&O outreach shifted to be fully remote beginning in March 2020 in order to accommodate shelter-in-place orders. Email campaigns, webinars, virtual portfolio reviews and one-on-one calls remain the primary method of outreach. The SOMAH PA also referenced updated internal market research (see Section 4.2.2) to better understand the distribution of current SOMAH projects in DACs and the potentially eligible properties located in DACs, in order to increase DAC participation and address the geographic gaps in the current pipeline. As the SOMAH PA looks ahead toward 2021, outreach efforts will target DACs in the Central Valley and Los Angeles regions, as these are areas where the opportunity for increasing DAC participation is greatest.

The SOMAH PA acknowledges that all the events that took place this year will continue to impact ME&O outreach efforts in 2021 and that long-term impacts have yet to be realized. These impacts have largely affected low-income, underserved, environmental justice communities, which are the communities SOMAH was created to reach and serve. Looking forward, the SOMAH PA will continue to develop resources that acknowledge these communities' priorities while continuing to share SOMAH's benefits.



**Figure 20 – Number of Completed and Planned Surveys by Category**

Survey Category	Number of Surveys Completed (through Q4 2020)	Number of Surveys Planned (through Q2 2021)	Number of Surveys Planned (through Q4 2021)
CBO Surveys	0	0	1
Contractor Surveys	3	0	1
IOU Surveys	0	0	1
Job Training Surveys	0	2	0
Property Owner Surveys	2	2	1
Tenant Surveys	0	4	0

The SOMAH PA will finalize many of its scheduled surveys at the start of 2021. As evident in Figure 20, several surveys that were planned for release in Q3 and Q4 2020 were delayed or postponed indefinitely due to COVID-19. Surveys that were set to be released after the Proof of Project Milestone (PPM), which include tenant education, trainee and project completion surveys, were most impacted by the COVID-19 public health crisis. These surveys will be completed and released between the first and third quarter of 2021, pending projects at PPM. Key survey efforts in 2021 include a comprehensive survey to be sent to property owners and contractors after project completion to gauge their entire experience with SOMAH. In addition, a new survey will be developed and released in 2021 on the ongoing impacts of COVID-19 for contractors, property owners and potentially other audiences. This survey will seek to understand the impacts of COVID-19 on audience day-to-day operations as well as barriers and willingness to participate in an incentive program like SOMAH.

Despite delays due to the COVID-19 public health crisis, the SOMAH PA developed and released other surveys in 2020 to provide valuable quantitative insight into SOMAH's contractor and property owner audiences. Survey responses showed an array of impacts, with some respondents experiencing no COVID-related impacts on their business or SOMAH applications, while other respondents reported complete operational standstills and application delays. The most substantial experienced or anticipated impacts on SOMAH program applications reported by respondents were meeting: 1) job trainee requirements (46%); 2) on-site installation (46%); and 3) Energy Efficiency Milestone (38%). The results of these surveys were presented to stakeholders during public forums and internal stakeholder meetings. The results of these surveys were used to determine immediate and long-term outreach tactics for property owners and contractors. Results also helped guide decision-making on milestone extensions.



This survey collected responses during the initial months of the shelter-in-place order, reflecting an emerging situation. A second survey will be launched in February 2021 in order to gauge the long-term effects of the pandemic and the resulting shelter-in-place orders.

In September, the SOMAH PA released a Barriers to Entry survey to contractors to determine barriers to participation in the program. This survey focused on identifying what factor(s), if any, prevent or dissuade smaller, minority-owned contractors. Valuable feedback from this survey was used in shaping the 2021 contractor ME&O approaches. In June and July, the SOMAH PA also released two surveys targeting property owners. The first survey was targeted at property owners in the SOMAH Listserv who had not started applications and will be relaunched biquarterly or quarterly. The second survey is ongoing, collecting responses from property owners who are being recruited to join the SOMAH Listserv.

The SOMAH PA launched a survey to property owners in order to determine interest in SOMAH and challenges this audience faces. Of those surveyed, 3.6% of respondents indicated that they were no longer interested in participating in SOMAH. Key barriers identified were financial barriers (44%) and lack of application knowledge (33%). Necessary support identified included tutorials on the SOMAH reservation package, webinars on specific programmatic components, access to eligible property portfolios and education materials.

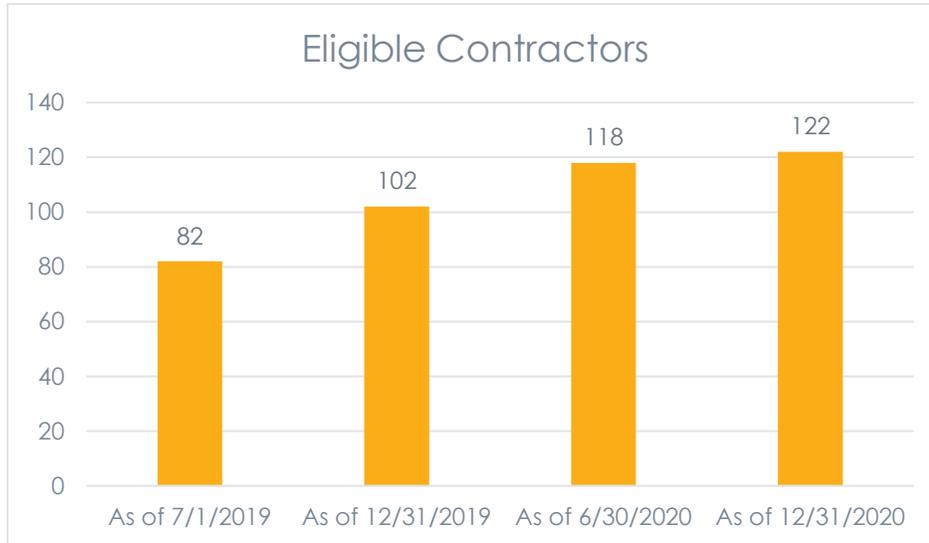
### 3.2.1 Contractors

In the latter half of 2020, the contractor stakeholder group continued to have a high level of engagement with the SOMAH program due to the high volume of Track B applications, where contractors typically act as the applicant on behalf of the property owner. The SOMAH PA continues to market the program to potential participating contractors through hosting bimonthly applicant and Contractor Eligibility Training webinars. This webinar introduces the program at a high level and then provides more in-depth information on the various program milestones and the application submission process. Content was added to the webinar addressing program adaptations due to COVID-19. Additionally, the SOMAH PA interacted with contractors through the Barriers to Entry contractor survey that was deployed from mid-August through the end of October. The survey results demonstrated interest in SOMAH while identifying practical barriers for the PA to address and methods to support. Key takeaways include 67% of respondents indicated experiencing difficulties in participating in SOMAH. The primary difficulties identified were lead generation (52%), financial barriers (43%) and confusion about SOMAH program requirements (43%). Of respondents, 45.7% had previous solar incentive experience (62% of which was MASH), demonstrating the degree of newness



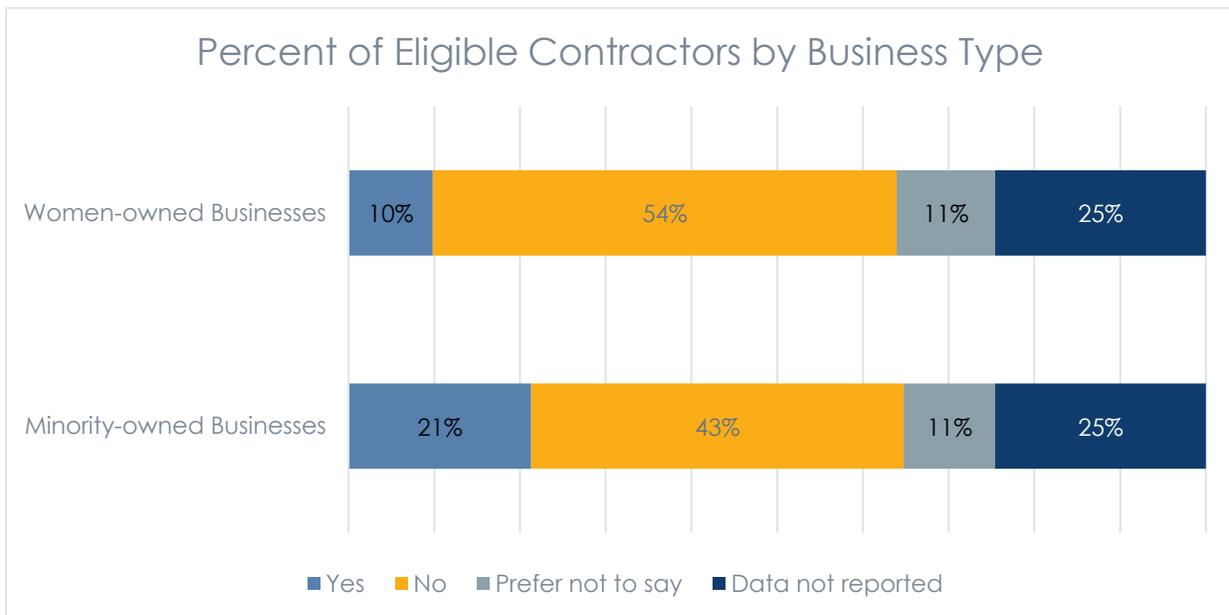
among SOMAH contractors and a key barrier to overcome. Actionable support for contractors was identified through survey results. Respondents identified the following opportunities for support: venue for SOMAH-eligible contractor-to-contractor contact, free marketing materials to share with customers and technical assistance services. Financial resources were also identified as a key form of support.

**Figure 21 – Number of Eligible Contractors Over Time**



While the SOMAH program continues to recruit licensed contractors through contractor outreach, the number of contractors with active applications has had incremental growth, with ten eligible contractors currently participating. It is understood by the SOMAH PA that subcontractors will heavily be used to complete installations, which will increase the contractor program participation metrics. This information does not get captured until projects reach the Proof of Project Milestone. The SOMAH PA has seen a larger quantity of projects reach this application milestone, and future reports will be able to capture and reflect this subcontractor data.

**Figure 22 – Contractor Statistics**



At program launch, the metrics on eligible contractor ownership displayed in Figure 16 were not captured but were added later, which explains the large portion of "data not reported" results. The SOMAH PA has made efforts to capture this information retroactively but unfortunately received low response rates from contractors.

Although the contractor stakeholder group continues to be meaningfully engaged with the program through phone and email inquiries to the SOMAH PA through the SOMAH inbox, webinar attendance and continued application submissions, there are evident barriers that may have hindered additional contractor participation. First, complications due to COVID-19 resulted in a significant slowdown in solar construction. Earlier in the year, the SOMAH PA administered a survey to eligible contractors with active applications to assess the impacts of COVID-19-related restrictions on their solar projects. While some contractors said they continued to operate, most respondents indicated that due to social distancing and shelter-in-place guidelines, application requirements such as the whole-building walkthrough audit in the Energy Efficiency Compliance Milestone were challenging to complete.

As mentioned in Section 3.1.1 Application and Incentive Statics, the Energy Efficiency Compliance Milestone Postponement option is a temporary program response to address these challenges by allowing projects that have received Reservation Approval to move forward to the Proof of Project Milestone. The SOMAH PA also developed COVID-19 guidance for energy auditors with information on alternative



compliance pathways to overcome challenges that may occur during an energy audit. This [resource](#) was made available for download via the program website.

Additionally, in response to the COVID-19 public health crisis, the SOMAH PA has focused ME&O efforts and messaging around how to safely operate during the pandemic. The SOMAH PA has worked to ensure that projects have the resources necessary to work safely and in alignment with public safety guidelines and protocols. This webinar had high engagement, with a total of 58 attendees, indicating that this was a helpful resource and important topic for contractors.

In addition to challenges contractors faced with COVID-19, other areas of the SOMAH program were identified as barriers from the Barriers to Entry survey, as outlined in Section 3.2. In total, 34 out of 205 eligible contractors participated in the survey. To increase participation, the SOMAH PA reached out to contractors via personalized emails and phone calls. After the survey closed, follow-up emails were sent with resources on topics that were identified as challenging from the survey. The survey results indicated that some of the main challenges impacting contractor's ability to participate in the SOMAH program included challenges in generating project leads, confusion about SOMAH program requirements and financial barriers.

Contractors also identified that tenant education and job training program requirements were not always clear. To address this, the SOMAH PA is revisiting communication with contractors around these topics and identifying strategic ways to more effectively communicate tenant education and job training requirements, particularly through an email drip campaign that will be launching in 2021. Updates were also made to the Applicant and Contractor Eligibility webinar content in efforts to make these specific program areas easier to understand. Additionally, a tenant education pilot was launched in effort to have contractors supported by CBOs to meet this program requirement.

### 3.2.2 Property Owners

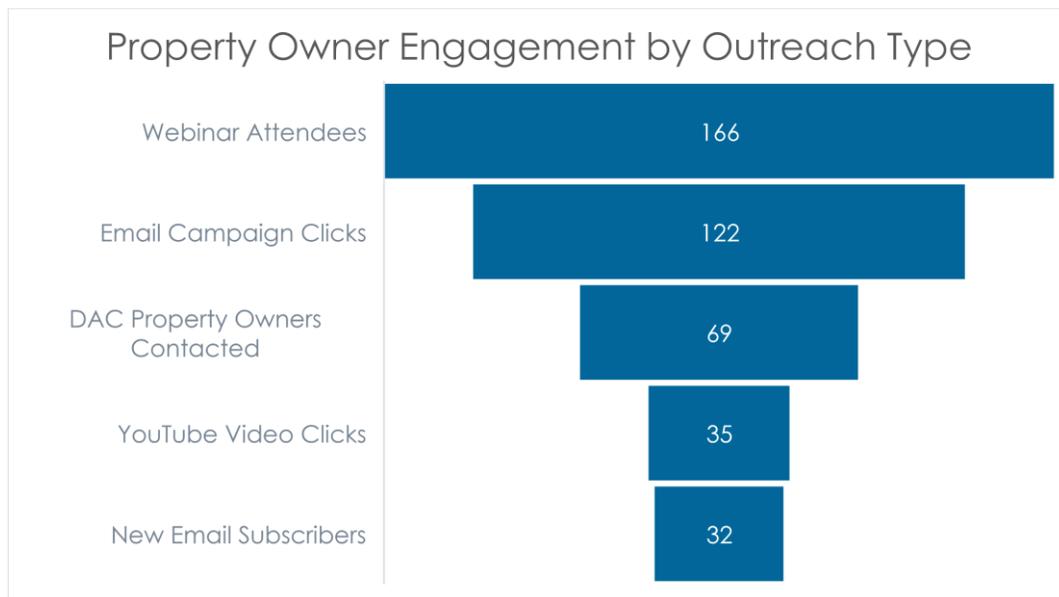
Similar to contractors, all ME&O efforts to property owners have been limited to online outreach, which has included webinars, email campaigns, one-on-one phone calls and virtual portfolio reviews. While online events can limit relationship building and engagement from audiences, the SOMAH PA has seen steady attendance numbers through webinars. The SOMAH PA conducted five webinars in the reporting period, which resulted in a total of 166 attendees. While some webinars were targeted at new property owners, most webinars focused on providing current property owners with resources on how COVID-19 will impact project timelines and programmatic changes the SOMAH PA has made to ensure projects are maintained and moving forward. The



following webinars were held during the reporting period and targeted the property owner audience:

- Property Owner series: Program Overview
- Tenant Education webinar
- Funding for Major LIHTC Major Rehabilitation Projects
- Green Talk: Clean Energy for Affordable Housing
- Green Talk: Clean Energy resources for SoCal

**Figure 23 – Property Owner Engagement**



The SOMAH PA has adjusted outreach to drive property owners to short program overview interest calls, in response to feedback from property owners on their limited schedules and availability. These calls cover the program eligibility requirements and benefits of installing solar as a way to garner property owner interest in the program. Since Q3 2020, the SOMAH PA has conducted nine interest calls, one of which resulted in an Upfront Technical Assistance Request being submitted. In 2020, the SOMAH PA was able to conduct email and phone outreach to 124 new property owners and property management companies.

This year's ME&O efforts focused largely on promoting Track A and its services in order to achieve a balanced pipeline of projects. New strategies were implemented to ensure property owners could easily and properly submit an Upfront Technical Assistance Request. The SOMAH PA has made efforts, such as one-on-one intake calls with a live walk through of the application portal, to ensure the Track A process is as



seamless as possible, especially during this time when property owners have limited capacity and a large amount of their attention has been shifted to the safety of their tenants. More information about Track A projects and their upfront technical assistance is included in Section 3.4.1, Upfront TA.

Outreach to property owners with properties in DACs was a priority for the SOMAH PA to address geographic gaps in project density and prioritize DAC participation across the state. The SOMAH PA conducted targeted outreach to property owners and property management companies in the Central Valley and Los Angeles County to enroll a larger number of DAC properties into the pipeline. Of the 124 new property owners reached, about 70 of them had properties located in a DAC.

Overall, outreach looked very different in 2020, with priorities shifting toward supporting property owners and helping them to understand how their applications would be impacted as a result of the COVID-19 public health crisis. However, the SOMAH PA continues to make strides in the efforts to increase both Track A participation and the number of properties located in disadvantaged communities.

### 3.2.3 Tenants

With many projects still in the pre-construction phase, the SOMAH PA and its four CBO partners have continued to focus on community outreach to multifamily affordable housing tenants about SOMAH and its benefits. Tenant education does not occur until construction is planned, so this community outreach is valuable to inform tenants and potential participants in the communities that SOMAH serves. In Q4 2020, the SOMAH PA contracted a fifth CBO partner — Self Help Enterprises (SHE) — located in the Central Valley. The SOMAH PA has been onboarding SHE so they can begin conducting outreach to Central Valley communities, as well as contractors and property owners to support tenant education, and share job training opportunities with tenants and the local community. Contracting with SHE is helping to address geographic gaps within the program and ensure all communities that can benefit from the SOMAH program are informed and provided with engagement through a local CBO.

Due to the COVID-19 public health crisis, the SOMAH PA and its CBO partners have conducted nearly fully remote outreach and have integrated into SOMAH materials and events messaging about COVID-19 safety, economic recovery and disaster preparedness to support the communities they work with. Overall in 2020, CBOs conducted a series of 11 workshops reaching 95 attendees.

The SOMAH PA has continued to explore opportunities to co-market the SOMAH program with IOUs as a strategy for tenant education and engagement. In mid-2020,



the SOMAH PA worked with the CPUC to collate, organize and prioritize CBOs that partner with IOUs in an effort to identify potential co-marketing partnerships. Outreach to IOUs and these potential CBO co-marketing partners will begin in early 2021, with a co-marketing toolkit that the SOMAH PA has begun to develop. The SOMAH PA has integrated California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA) and other IOU offerings into the CBO educational outreach curriculum. Additionally, the SOMAH PA worked closely with all five IOUs to design user-friendly SOMAH VNEM (virtual net energy metering) bills, to ensure tenants receive bill samples prior to their new SOMAH bill and understand how to identify their savings.

The SOMAH PA also has begun finalizing tenant education evaluation tools that will be piloted in Q1 2021, depending on the status of current applications. These tools include a suite of surveys, focus groups and interviews that will collect qualitative and quantitative data to evaluate and inform tenant education and outreach efforts. The SOMAH PA also continues to receive feedback from CBO partners on outreach materials and messaging. CBOs will support tenant education services in 2021, which include a “train-the-trainer” series that aims to educate property owners and contractors on how to use the tenant education toolkit and conduct tenant education and a pilot service to help property owners achieve part of their tenant education requirements.

### 3.2.4 Other Stakeholders

There are additional stakeholders that have vested interests in SOMAH. The SOMAH PA identifies stakeholders as audiences whose interests in the program lie outside of directly participating, but who serve the communities where SOMAH has an impact. These entities include IOUs and community choice aggregators (CCAs); state, regional and local government agencies; industry associations; the CPUC; the California Energy Commission; and other non-SOMAH contracted CBOs.

As with all audiences, the COVID-19 public health crisis continued to present challenges for in-person outreach activities with stakeholders, so efforts were shifted to be fully remote. The SOMAH PA has focused on equipping stakeholders with high-level program information and resources to share with their constituents and communities served. The resources made available by the SOMAH PA include a downloadable marketing toolkit, which contains a flyer, imagery for email, web and social media and promotional copy that can be used in a newsletter or website. The SOMAH PA has created a toolkit specifically for government agencies and legislators, as well as a toolkit for CCAs and IOUs, to ensure the messaging and information included is most relevant to their respective audiences.



Additionally, the SOMAH PA continued efforts to engage with stakeholders already familiar with SOMAH, such as IOUs, by sharing information through the SOMAH email list and monthly Working Group meetings (specifically for IOUs). The SOMAH PA uses these working group meetings to report progress and leverage IOU resources and networks. In 2021, the SOMAH PA will continue reaching out and hosting meetings with IOUs to explore possible co-marketing opportunities as more projects reach completion.

Email outreach with local governments focused messaging around the number of active SOMAH projects within their given jurisdictions and highlighted completed SOMAH projects within the community. From these emails, it was apparent that the majority of government figures were interested in learning more and hearing from the SOMAH PA once projects were completed. Therefore, to further engage stakeholders in 2021, ribbon-cutting ceremonies will be hosted by the SOMAH PA once projects are complete, and it is deemed safe to do so. Once a larger number of projects reach this step in the process, the SOMAH PA will further explore this type of collaboration and opportunity for partnership with local governments.

The SOMAH PA is continuing to keep the CPUC's Low-Income Oversight Board and the South Coast Air Quality Management District engaged with the SOMAH program and aware of important program updates. In addition to sharing key program documents (SOMAH Semiannual Progress Report and annual SOMAH Marketing, Education and Outreach Plan) and providing semiannual updates, the SOMAH PA is continuing to strategize on the most effective engagement and communication methods for these groups.

### 3.2.5 ME&O 2021 Plan

In Q3 2020, the SOMAH PA began developing the program's annual ME&O Plan for 2021. The 2021 SOMAH ME&O Plan outlines the ME&O-related activities of the SOMAH PA and CBO partners to reach the program's target audiences and meet the overall program goals. Each plan builds off the previous year's plan, with strategic adjustments to account for lessons learned from previous program years. The ME&O goals for the 2021 plan are similar to those from the 2020 plan and are listed below (bold text indicates how and where the goals have been updated for the 2021 plan).

- Goal 1: Engage property owners to build and maintain a multiyear pipeline of diverse projects
- Goal 2: Continue building a robust and diverse contractor base and support eligible contractor retention
- Goal 3: Ensure sufficient job trainee participation and preparation for SOMAH job training opportunities or relevant careers



- Goal 4: Educate SOMAH-eligible tenants and tenants living in participating SOMAH properties about the program and how to maximize their benefits
- Goal 5: Ensure stakeholders are informed of and helping to co-market the program

The plan also has several overarching strategies to help guide the implementation of the goals, objectives and activities for 2021, including the following.

- Engage in strategic partnerships with IOUs and CBO subcontractors to promote and co-market the program
- Clarify diversity objectives, setting measurable targets and focusing on increasing DAC participation across the program
- Prioritize safety by sticking with digital and remote engagement strategies in response to the COVID-19 pandemic

The plan will undergo a two-week public comment period in the beginning of January 2021, after which the SOMAH PA will respond to comments and update and finalize the plan. A final version of the 2021 ME&O Plan will be completed and uploaded to California Distributed Generation Statistics [website](#) by the end of January 2021.

### 3.3 Workforce Development

A primary goal of SOMAH is to promote economic development in low-income and underserved communities through job training opportunities and local and targeted hiring. A key focus of SOMAH's workforce development program is safety, which the SOMAH PA has continued to uphold during the COVID-19 pandemic.

#### Safety Resources and Updates

Since the last Semiannual Progress Report in July 2020, solar installation has remained classified as an essential service by the state, and the SOMAH PA has continued to provide updated health and safety resources to all program participants through the [CalSOMAH.org/COVID19](https://CalSOMAH.org/COVID19) website and the Job Training Portal. The SOMAH PA continues to make progress on a comprehensive job site safety guide for contractors and job trainees that is scheduled to be published in Q1 2021.

The health and safety of job trainees, tenants, contractors and all program participants are the main priority of the SOMAH PA. The SOMAH PA will continue to provide updated health and safety resources to all program participants through the CalSOMAH website, the Job Training Portal, webinars and public forums. The SOMAH PA also will actively



seek input from contractors and job trainees, monitor the COVID-19 situation and remain nimble to adjust the job training requirements, if needed, in the future.

#### Trainee & Job Training Organization Outreach

In coordination with SOMAH's workforce development partner, Rising Sun Center for Opportunity, the SOMAH PA has continued to conduct outreach to job training organizations (JTOs) and prospective trainees. The SOMAH PA was able to engage more than 60 job trainees in a virtual Solar Career Pathways and Resume Writing Workshop series in July 2020 and will continue to plan remote career development events for job seekers into 2021.

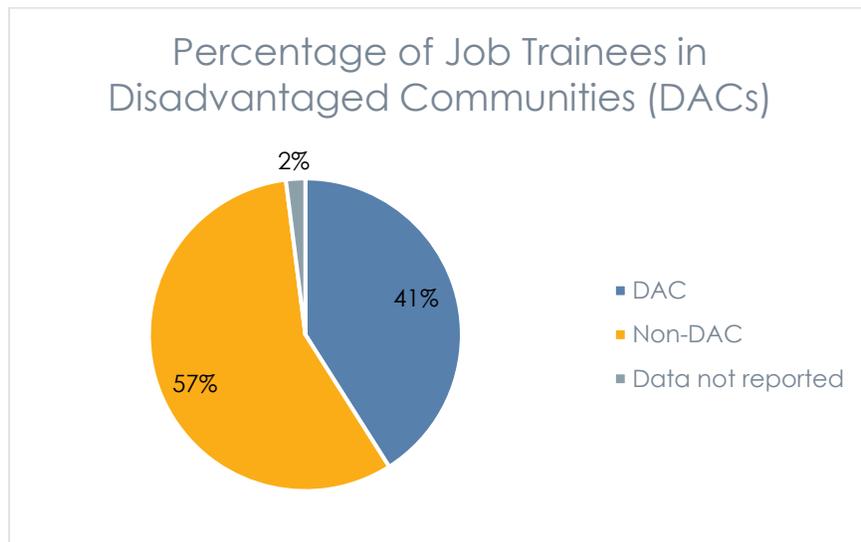
The SOMAH PA, with the support of JTOs and CBOs, will continue to build trainee participation in the SOMAH Job Training Portal and ensure that the trainee pipeline includes tenants of SOMAH properties. This includes providing property owners with educational materials for tenants that promote the job training opportunities at their properties. The program has already seen one tenant participate as a job trainee on a SOMAH project in the Central Valley.

As of December 2020, the SOMAH PA has engaged 80 JTOs (20 new JTOs since 2019) and continues to actively contact and vet over 300 JTOs. The SOMAH PA has also engaged 290 job trainees (160 new trainees since 2019) on the SOMAH Job Training Portal and continues to target its JTO and job trainee outreach in regions where there is a high volume of SOMAH projects and disadvantaged communities. Of the 290 trainees registered on the Job Training Portal, 41% reside in disadvantaged communities (see Figures 24 and 25).

#### 3.3.1 Local Hiring and Job Training

To date, more than 280 trainees have signed up on the [Job Training Portal](#). Due to the limited number of projects that have completed construction and reached program milestones where job training data is entered, the SOMAH PA has only been able to provide projections as placeholder data for key metrics such as total number of trainee hours and number of jobs generated. This data is based on current SOMAH project application data (including reservations and waitlisted projects). Data on local and targeted hires and trainee job advancement (i.e., the number of SOMAH trainees who become full-time solar employees) will be collected through surveys and the Job Training Affidavit once projects reach the Incentive Claim Milestone.

**Figure 24 – Job Trainees Located in DACs**



**Figure 25 – Projected Job Trainee Count and Metrics**

Job Trainee Metrics	Active applications	Waitlist applications	Total
Number of job hours	53,120	0	53,120
Number of job weeks	1,328	0	1,328
Number of job years	26	0	26
Number of SOMAH project applications	406	0	406
Number of trainees	770	0	770

### 3.4 Technical Assistance

The SOMAH program offers two TA options: upfront TA and standard TA. The SOMAH PA continues to hold recurring internal coordination meetings for TA utilizing a detailed process flow for TA handoff to ensure seamless experiences for both upfront and standard TA requests. The technical assistance requests for this reporting period provided an opportunity to gain additional feedback on the TA process and contributed to process improvements and feature enhancements for the online bidding tool as discussed in Section 3.1.2.



### 3.4.1 Upfront TA

Considering installing solar in affordable multifamily properties requires property owners to navigate and overcome barriers, including complex ownership and financing structures and a general lack of knowledge about solar costs and benefits. To help level the playing field and overcome these barriers, upfront TA services are designed to supply property owners participating in Track A with educational, technical and financial resources to facilitate their solar installation. Offering upfront TA services not only sets the SOMAH program apart from similar previous programs but provides property owners who are less familiar with solar with equal access to program benefits.

Property owners enter Track A with varying levels of solar experience. Through guidance from a designated energy project manager, each property owner receives personalized support to accommodate their specific needs, including understanding the SOMAH program process, investigating the solar potential at their property, selecting an eligible contractor using a multiple bid process and evaluating the costs and benefits of moving forward with a solar project. To date, there have been two Track A projects that have received upfront technical assistance, with another project close behind that should receive their Upfront Technical Approval in early 2021.

Tenant benefits continue to be a central pillar of the SOMAH program as well as a focus within Track A. As a result of the upfront TA services thus far, over 170 low-income households are projected to receive direct benefit from solar credits. Of the households benefiting, 56% are occupied by senior citizens, a vulnerable population that often does not have the resources to respond to the increasing financial burdens of rising energy costs due to fixed incomes. Tenants will receive additional benefits from the Track A projects that decide to pursue programs for leveraging energy efficiency resources and incentives. One project used upfront TA services to receive a referral to, and ultimately enrolled in, a comprehensive energy efficiency program.

From the two Track A projects served to date, over 96% of the clean energy produced is expected to benefit tenants via VNEM bill credits. The energy produced by these proposed systems is expected to offset approximately 91% of the tenants' historic annual electrical consumption. Of the Track A projects thus far, the average estimated system size is 206 CEC-AC kW with a total expected aggregate annual output of 742,620 kWh. The Figure 26 outlines additional system statistics for Track A projects across the IOU territories.



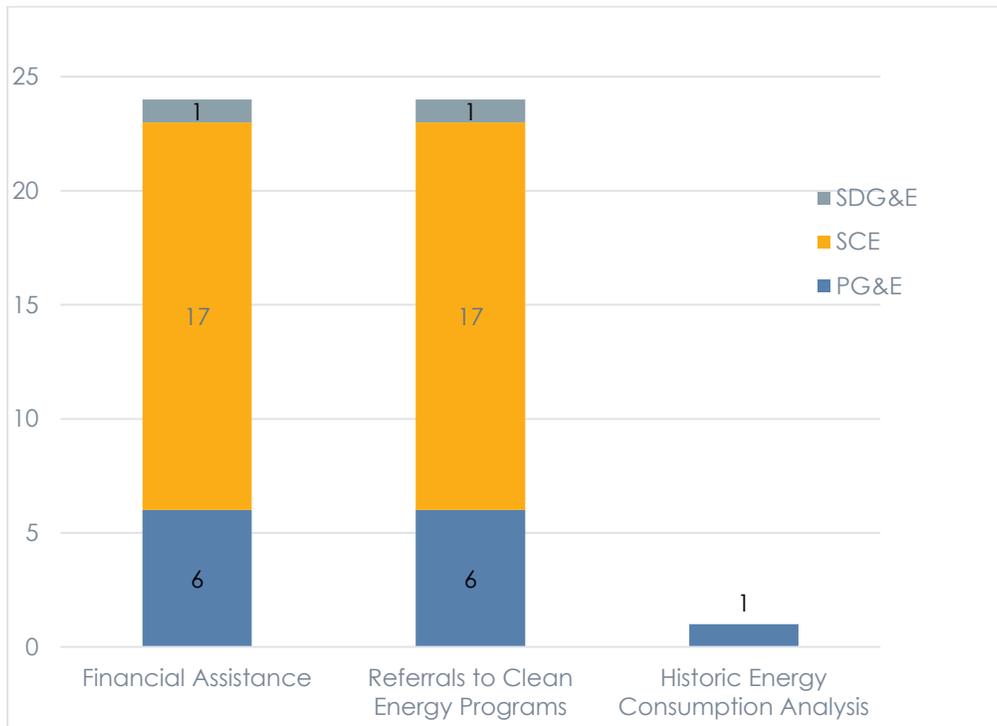
**Figure 26 – Track A Reservation Summary**

IOU	Number of Reservation Requests Submitted	Estimated SOMAH Incentive	Estimated System Size (CEC-AC kW)	Expected Aggregated Annual Output (kWh)
PG&E	1	\$345,990	118	179,515
SCE	1	\$599,552	294	563,105
SDG&E	0	\$0	0	0
Liberty Utilities	0	\$0	0	0
PacifiCorp	0	\$0	0	0
Total	2	\$945,542	412	742,620

### 3.4.2 Standard TA

Standard TA services are available to both Track A and B projects and can be requested by property owners or their contractors at any time during their enrollment in SOMAH. Challenges and questions can arise at any point during a solar project, and standard TA services are designed to aid property owners and contractors when needed.

**Figure 27 – Standard TA Services Requested**





Some typical standard TA services include coordination with and referrals to clean energy programs, assistance with virtual net energy metering allocations and referrals to IOU resources to better understand post-solar utility bill impacts and post-solar utility bill statements. Figure 27 shows the standard TA services requested to date across the IOU territories.

## 4. Program Planning and Development

To preserve long-term program growth, the SOMAH PA takes an adaptive approach to ensure that feedback is regularly solicited and communicated to program participants and stakeholders. The SOMAH PA aims to implement the program and make program development decisions transparently and in close partnership with the program's advisory bodies and CBO partners, while remaining accountable to the communities SOMAH was intended to benefit. The following section provides information on the SOMAH PA's maintenance of official records as well as efforts to collect feedback regarding program implementation and development from key stakeholders and community beneficiaries.

### Official Record Maintenance

The SOMAH program has various types and frequencies of public reporting. The information below outlines these reports and their location.

- SOMAH Incentive Budget Report and Working Data Set (updated weekly)
- Semiannual Progress Reports
- Semiannual Expense Reports
- Annual marketing, education and outreach (ME&O) plans

Place of record: [https://www.californiadgstats.ca.gov/programs/#\\_subsection\\_17](https://www.californiadgstats.ca.gov/programs/#_subsection_17)

- Special reports to the California Legislature
- Third-party evaluation reports

Place of record: <https://www.cpuc.ca.gov/General.aspx?id=6442454736>

During this reporting period, the SOMAH PA highlights two areas of growth and focus: 1) update on activities related to reporting, feedback and accountability; and 2) program design updates, including updates to the program handbook, an overview of the updated market assessment findings and an overview of existing and potential strategies for increasing program participation in DACs that was sent to the CPUC in the



form of a memo from the SOMAH PA.

## 4.1 Reporting, Feedback and Accountability Mechanisms

### 4.1.1 Public Forums

SOMAH public forums are quarterly events that allow the SOMAH PA to share program updates, such as statistics regarding program implementation; to propose modifications to program implementation to better attain program objectives; and to solicit feedback from program stakeholders about their experience with the program and potential improvements.

The SOMAH PA held two public forums for this reporting period. Agendas for both public forums included an update on key program stats and highlighted some of the program's successes from its first year. They both also included an update on current SOMAH regulatory activities, including advice letters related to SOMAH Program Handbook modifications and the SOMAH Progress Payments Proposal.

The Q3 2020 public forum included:

- A two-part session on SOMAH's equity and environmental justice goals, with SOMAH's CBO and JTO partners participating as guest speakers for part of the presentation
- A review of the program's CBO and JTO partners' activities to support tenant education and job trainee placement, including an overview of the communities they serve
- Space for input on planned CBO and JTO partner activities.

The Q4 2020 public forum included:

- A session on SOMAH's Third-Party Phase 1 Program Evaluation — presenting key findings and recommendations, outlining proposed actions to address those recommendations and seeking feedback on the proposed actions
- A session focused on supporting DACs — why SOMAH prioritizes DACs and ways to support the acquisition of projects in DACs.

The SOMAH PA publishes the presentation slide decks and meeting notes, including stakeholder questions and SOMAH PA answers, via the CalSOMAH.org website following each public forum event.



Q3 2020 public forum place of record:

- [SOMAH Public Forum Q1 2020 Presentation](#)
- [SOMAH Public Forum Q1 2020 Notes](#)

Q4 2020 public forum place of record:

- [SOMAH Public Forum Q2 2020 Presentation](#)
- [SOMAH Public Forum Q2 2020 Notes](#)

#### 4.1.2 IOU Working Group

The SOMAH PA hosts a monthly IOU Working Group meeting with attendance from program manager representatives from each of the five SOMAH-eligible IOUs and the CPUC Energy Division. This regular working group is a time for the SOMAH PA to provide program updates for the IOUs and solicit feedback on various aspects of the program. Discussion topics from past IOU Working Group meetings included the following.

- Progress Payments Proposal
- CARB reporting
- Program status updates
- Projects starting construction
- ME&O plan review
- Annual data request for ESA referral status
- Program co-branding opportunities
- Third-party program evaluation recommendations

The SOMAH PA works closely with the IOUs to ensure successful implementation of the program, and this working group is an example of the committed partnership among many stakeholders. The SOMAH PA solicited feedback from the Working Group in October to better understand the needs and interests of the regular meeting attendees. The feedback was positive, reflecting satisfaction with the structure, communication and outcomes of the monthly meetings. The value of the meetings was communicated as keeping IOU stakeholders engaged with SOMAH and sharing feedback. Responses established expectations from among the group, valuable in future planning. Actionable insights were feedback on what past topics were of interest to the working group members (progress payments proposal, VNEM tariff and interconnection), as well as those topics that were less applicable (PA's COVID-19 response).



### 4.1.3 SOMAH Advisory Groups

#### Advisory Council

The purpose of the SOMAH Advisory Council<sup>8</sup> (SOMAH AC) is to ensure that the voices and interests of equity-focused community advocates and key stakeholders remain at the center of the SOMAH program for its duration and that SOMAH maximizes benefits to low-income tenants and DACs by advising the SOMAH PA on program development and implementation.

There are nine SOMAH AC members that represent focal areas in environmental justice, workforce development/labor, tenant rights, affordable housing and the solar industry. The SOMAH AC meets quarterly to monitor and discuss (via a range of agenda topics) the progress of the program and to provide guidance and advice to ensure that the program maximizes benefits to the communities it intends to serve.

In the Q3 2020 meeting, the SOMAH PA and Advisory Council accomplished the following:

- Shared program updates, including an update on regulatory proceedings around the Handbook 3.0 Advice Letter, Progress Payments Proposal and recommendations from SOMAH's Third-Party Phase 1 Program Evaluation findings and recommendations
- Spotlighted some of the work of other SOMAH AC members through short presentations
- Held a successful visioning session to reflect on progress to date, identify top priorities for 2021 and begin to define success.

For the Q4 2020 meeting, the JTO Task Force and the Advisory Council had the first annual crossover meeting. The two groups accomplished the following.

- SOMAH AC and JTO Task Force members got to know each other and the work that both groups have done over the last year.
- The SOMAH PA identified topics of mutual interest and provided relevant program updates.

<sup>8</sup> The framework for the SOMAH AC is generally modeled on the existing Senate Bill (SB) 350 Disadvantaged Communities Advisory Group (DAC-AG), though there are inherent differences around reporting requirements and council appointments.



- The SOMAH AC and JTO Task Force discussed job training-related recommendations from Third-Party Phase 1 Program Evaluation.

Starting in Q1 2021 the SOMAH PA will begin determining a process and planning for the next Advisory Council cohort, since current members will reach the end of their term in Q2 2021.

#### Job Training Organization Task Force

The purpose of the Job Training Organization Task Force (JTO Task Force) is to ensure that the voices and interests of job training organizations remain at the forefront of the SOMAH program's job training efforts. The JTO Task Force advises the SOMAH PA on strategies for engaging job trainees and the creation of resources to ensure that trainees obtain maximum benefit from training opportunities on SOMAH installation projects, including subsequent, full-time job offers in the solar industry and, over time, career advancement and wage growth.

The JTO Task Force is composed of nine regionally diverse representatives from JTOs, including California Community Colleges, career technical education programs, community nonprofits and private job training centers. Similar to the SOMAH AC, the JTO Task Force meets quarterly. Since the last Semiannual Progress Report was released in July 2020, the JTO Task Force has held two quarterly meetings and formed three working groups to focus on the following topics:

- Job training opportunity accessibility
- Long-term career advancement
- JTO engagement.

In the Q3 2020 meeting, the JTO Task Force accomplished the following:

- The SOMAH PA shared SOMAH program updates.
- The JTO Task Force focus area work groups provided a report out on work group meetings.
- The SOMAH PA gathered feedback from the task force on safety resources and job training compliance.
- The JTO Task Force built consensus around proposed recommendations to SOMAH PA.
- The Task Force discussed a bylaw adjustment for remote meetings related to COVID-19.



For the Q4 2020 meeting, the JTO Task Force and the Advisory Council had the annual crossover meeting. The two groups accomplished the following:

- SOMAH AC and JTO Task Force members got to know each other and the work that both groups have done over the last year.
- The SOMAH PA identified topics of mutual interest and provided relevant program updates.
- The SOMAH AC and JTO Task Force discussed job training-related recommendations from third-party program evaluation.

#### 4.1.4 Third-Party Program Evaluation

Public Utilities Code (PUC) Section 913.8 requires the CPUC to provide the Legislature with a report on SOMAH program participation and progress toward legislative goals through a multiphase evaluation process. Phase 1 of the 2020 third-party evaluation began in the second half of 2019 and was completed by Q3 2020. The evaluation report was published on August 27, 2020. The SOMAH PA coordinated with third-party evaluators Verdant and Illume to provide an overview of all aspects of the program administration, including the planning and development of reporting processes. The outcome from the [Phase I Evaluation](#) was seven recommendations for the SOMAH PA and Energy Division's consideration.

The SOMAH PA carefully reviewed the Phase I recommendations and developed detailed responses to each. The recommendations and SOMAH PA responses were shared with program stakeholders to solicit feedback and ensure a thorough and comprehensive response. Stakeholders included the SOMAH Advisory Council, the SOMAH CBOs, IOUs and the public, via the 2020 Q4 Public Forum. Phase I responses from the SOMAH PA have been compiled and attached to this report in Appendix B.

Phase II of the 2020 SOMAH third-party evaluation began in Q4 2020, collecting data from August to December 2020. Phase II reporting will take place between January and March 2021. Phase II of the evaluation incorporates qualitative and quantitative data collection across the SOMAH program, in addition to assessing spending, impact and evaluability. This data encompasses billing and solar PV data, as well as property owner and contractor interviews. The SOMAH PA is partnering with Verdant and Illume to share information and create a smooth, efficient data collection process. There has been close collaboration between Verdant and Illume and the SOMAH PA to avoid redundant efforts as well as oversaturation of those to be surveyed or interviewed. The Draft Phase II Report is anticipated to be released in mid-February 2021, and the Final Phase II Report to be completed by the end of March 2021.



In November 2020, Illume developed a memo outlining their proposed metrics to track SOMAH's progress against its program goals. The memo outlined six different metrics to track program progress, with the goal of reducing these down to a set number of metrics to be tracked across future evaluations. These metrics are due to be finalized in early 2021.

## 4.2 Program Design and Updates

### 4.2.1 Program Handbook

This subsection reviews the SOMAH PA's work to update the SOMAH Program Handbook conducted during this reporting period.

Advice Letter CSE AL 114-E – Pending (Conditional Lottery)

The SOMAH PA submitted Advice Letter (AL) CSE AL 114-E on June 26, 2020, during the last reporting period, to propose several changes to the SOMAH Program Handbook. The previous Semiannual Progress Report summarized the proposed changes as follows:

- Proposed substantive revisions include a revision of SOMAH's first-come, first-served approach to application processing and waitlisting, required notifications for early trainee termination and requirements for system changes affecting incentive amounts.
- Proposed minor revisions include the further specification of the applicable incentive rate, clarification regarding the prohibition of reservation transfers, required job posting timeline for SOMAH training opportunities, clarification of wage requirements for projects with subcontractors, changes to the energy efficiency compliance milestone lookback period, allowance of electronic incentive payments, specifications for grounds for incentive payment clawback, requirements for an affidavit ensuring SOMAH income level compliance, updated Cover Sheet for Multifamily Low-Income Housing Documentation and further specification of types of ineligible multifamily properties.
- Other edits included typographical/nonsubstantive revisions to correct errors, modify word choices to further clarify program rules, rearrange bodies of text to improve the flow of the presented information and define additional terms that are used in the SOMAH program and handbook to provide common definitions.

Sunrun submitted a Protest to CSE AL 114-E, and the SOMAH PA replied on July 23, 2020. The AL was suspended on July 29, 2020, and Sunrun replied to the PA's Reply to its Protest on July 30, 2020. As of the submittal of this report, the SOMAH PA awaits disposition of CSE AL 114-E.



Advice Letter CSE AL 118-E - Approved (Progress Payments Proposal)

Building on last period's effort to design a progress payments offering, the SOMAH PA submitted CSE Advice Letter (AL) 118-E, which formally proposed an optional two-payment incentive structure that pays incentives based on completion of discrete project milestones and may be selected in preference to the existing single incentive payment structure that pays the incentive once all SOMAH requirements have been met.

The SOMAH PA, following stakeholder protests and comments, submitted a Supplemental Advice Letter, modifying the proposal to clarify that installation completion is defined as "mechanical completion," and inserting a virtual inspection step that will allow the SOMAH PA to verify mechanical completion before the issuance of progress payments, as summarized below.

Progress Payment	60% of total incentive	Paid after mechanical completion, verified via virtual inspection
Final Payment	40% or remainder of total incentive (pending true-up)	Paid after Incentive Claim Form review and approval

The following timeline provides a summary of the regulatory process surrounding progress payments.

- September 18, 2020: CSE AL 118-E submitted to propose progress payments
- October 8, 2020: Responses and Protests due
  - CPUC Public Advocates Office (PAO) and SDG&E protest
  - Seven other groups provide Responses and/or letters of support: Rising Sun Center for Opportunity; CALSSA; joint submittal by CEJA, APEN, CBE, EHC; SCE; PG&E; SOMAH advisory groups
- October 15, 2020: SOMAH PA replies to Protests and Responses
- November 19, 2020: SOMAH PA submits Supplemental AL, CSE AL 118-E-A
- December 3, 2020: Responses and Protests on Supplemental AL due
  - CPUC PAO protests
  - SDG&E submits Response with general support but with concerns, feedback
  - Four groups provide letters of support: MASH Coalition, Sunrun, Rising Sun Center for Opportunity, Brightline Defense



- December 10, 2020: SOMAH PA replies to Protest and Responses to Supplemental AL
- December 21, 2020: CSE AL 118-E-A, Progress Payments Proposal Advice Letter, was approved via a nonstandard disposition letter.

With the Progress Payments Proposal approved at the end of 2020, the SOMAH PA will work expeditiously to amend incentive contracts with the five SOMAH-participating IOUs to incorporate progress payments, complete application database updates and plan educational webinars and resources to successfully roll out the offering to SOMAH program participants. The SOMAH PA will monitor the new program design closely to ensure that projects are moving along through the application process expeditiously and do not experience delays or otherwise go off track after they receive the first progress payment. Additionally, the SOMAH PA will report on the status of projects requesting progress payments on a rolling basis through future Semiannual Progress Reports and other channels.

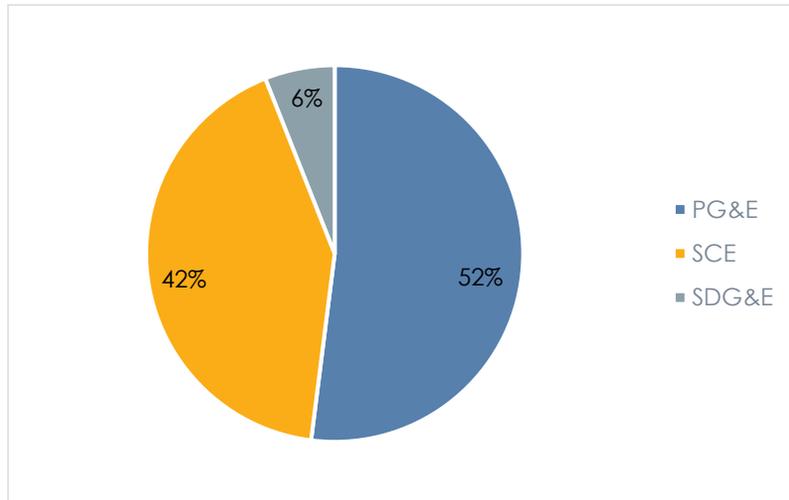
#### 4.2.2 PA Market Research

The SOMAH PA completed 2020 multifamily market research to build on prior market analysis conducted by the California Housing Partnership to explore key market segments and identify opportunities to expand targeted marketing efforts. A point of focus for this research consisted of broadening the analysis of SOMAH-eligible properties located in DACs to help the SOMAH PA better strategize around increasing program participation in underserved areas with high concentrations of DACs. This analysis is provided in the 2021 ME&O Plan and summarized below.

##### Potential SOMAH-Eligible Properties Located in DACs

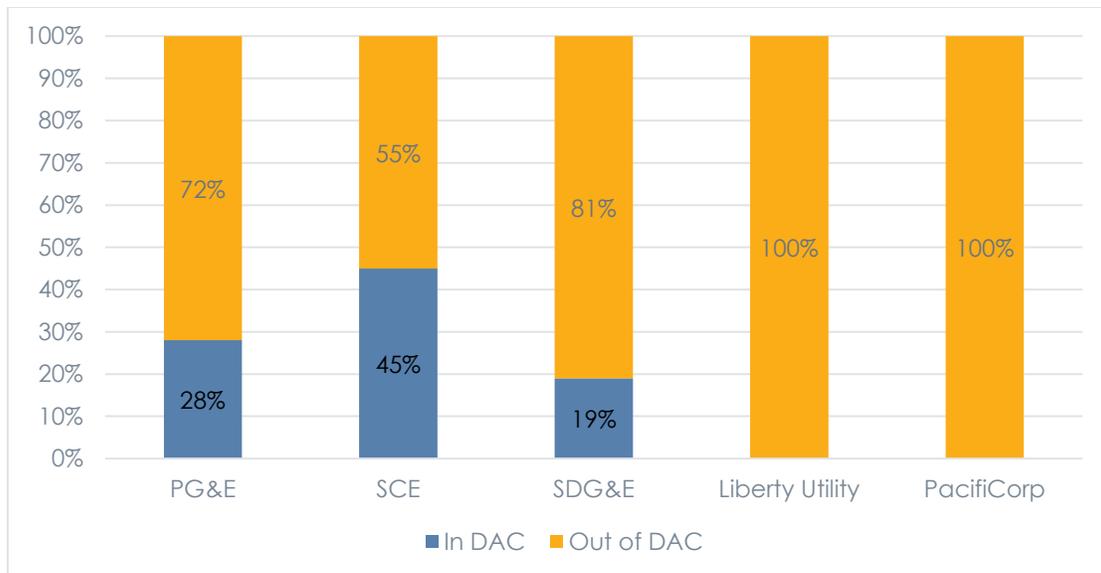
Approximately 30% (1,090) of all potentially eligible properties are located in disadvantaged communities (DACs) as defined by CalEnviroScreen 3.0. The shares of properties located in DACs vary among the IOUs. PG&E serves the highest overall number of properties in DACs (572), followed by SCE (453) and SDG&E (65) – neither PacifiCorp nor Liberty Utility service territories include any DACs; therefore, there are no eligible properties in DACs in these IOUs' service territories.

**Figure 28 – Share of DAC Properties by IOU Service Territory**



In determining the percentage of eligible DAC properties out of total eligible properties for each individual IOU territory, approximately 45% of SCE-serviced properties are located in DACs, 28% of PGE-serviced properties are in DACs and 19% of SDG&E-serviced properties are located in DACs.

**Figure 29 – Share of Properties In and Out of DACs by IOU**

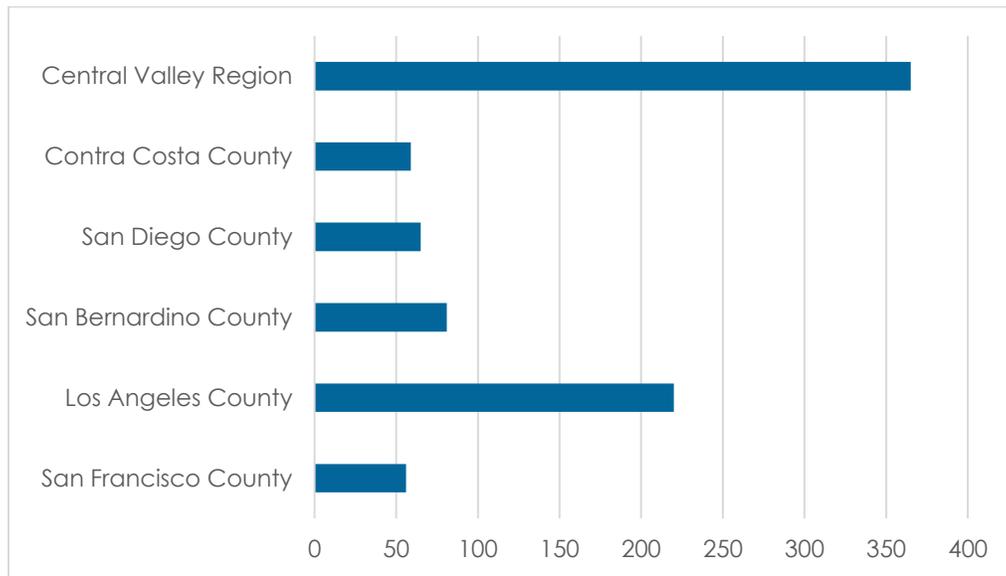




### Regions with the Highest Concentrations of Properties in DACs

As the SOMAH PA formulates outreach strategies to boost program participation in DACs, these strategies will be focused in regions with high concentrations of properties in DACs. One such region is the Central Valley where approximately 72% of potentially eligible properties within that region (365 eligible properties) are in DACs. Aside from the Central Valley, the counties with the highest concentration of DACs include Los Angeles (220), San Bernardino (81), San Diego (65), Contra Costa (59) and San Francisco (56).

**Figure 30 – Regions with the Highest Concentrations of DAC Properties**

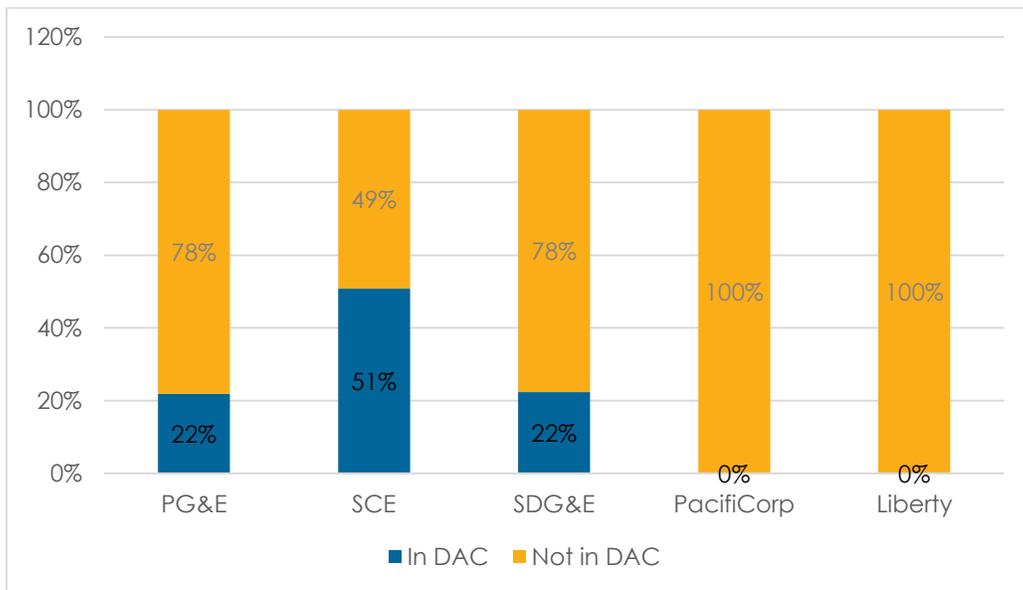


### Analysis of Active SOMAH Applications

As of December 2020, there are over 400 active SOMAH applications, of which, approximately 31% are for properties located in DACs — which is just above the 30% overall share of potentially eligible properties in DACs. Among the IOUs, PG&E has the highest number of applications (210), followed by SCE (126), SDG&E (67), Liberty (2) and PacifiCorp (1). On average, each IOU's share of applications in DACs is proportional to its overall share of potentially eligible properties in DACs. See Figure 31 for a visual breakdown of active SOMAH applications.



**Figure 31 – Share of SOMAH Application In/Out of DACs by IOU**



### Solar Potential of Potentially Eligible Properties

In order to estimate the solar potential of all SOMAH-eligible properties, the SOMAH PA used data from the working data set of active SOMAH applications (as of October 14, 2020) to make an average kW CEC-AC per tenant unit for each IOU territory. This “energy density” for each unit was multiplied by the total number of eligible properties in each territory and then multiplied by the total number of tenant units (not just affordable units, as all units regardless of affordability are eligible to receive financial benefits from SOMAH PV systems) in those properties to yield the total estimated kW CEC-AC of the total SOMAH-eligible low-income universe. According to this methodology, there is a total estimated capacity of 719.2 MW CEC-AC, which is greater than the 300 MW target for the SOMAH program.

There are limitations to this methodology, most notably in Liberty and PacifiCorp territories where there are both few eligible properties and few active SOMAH applications. Additionally, the capacity of a PV system is dictated by the amount of rooftop area, or the availability of space to install PV on new or existing carports or ground-mounts and cannot solely be estimated based on the number of tenant units.



**Figure 32 – Market Research Summary Table**

IOU	Average Energy Density (kW CEC-AC /tenant unit)	Number of eligible properties	Number of tenant units	Total estimated capacity (kW CEC-AC)
PG&E	2.542	2,031	158,278	402,348
SCE	2.882	1,014	79,841	230,094
SDG&E	2.544	342	31,824	80,972
Liberty	3.203	10	509	1,630
PacifiCorp	3.232	30	1,291	4,172
Total	--	3,427	271,743	719,216
				719.2 MW

### 4.2.3 CPUC DAC Participation Memo

In the second half of 2020, the SOMAH PA began providing quarterly updates to Commissioner Guzman Aceves, who is the presiding Commissioner for Rulemaking (R.)14-07-002, which covers the SOMAH program. One focus of discussion during these updates has been ongoing efforts to ensure robust participation by SOMAH-eligible properties located in DACs.

The market assessment discussed above revealed that approximately 30% of all potentially eligible properties are located in DACs. To date, approximately 31% of SOMAH applications are located in DACs, meaning that participation by properties located in DACs is roughly proportional to the universe of eligible properties.

While the program's design places eligible properties in DACs and low-income communities on equal footing in their ability to access SOMAH incentives, the program's work, funded by cap-and-trade dollars, has clear restorative justice implications. The SOMAH PA is therefore committed to expanding the program's benefits, from bill credits to job training opportunities, to as many Californians living in DACs as possible. This commitment informs the SOMAH PA's investment in community-driven marketing as well as education and outreach efforts through our partnerships with CBOs. As reviewed above, these partnerships were extended during this period and will be augmented by a new CBO partnership serving the Central Valley region in 2021.

At the Energy Division's request, the SOMAH PA completed one of two memos outlining options to increase participation by properties in DACs. The memo, completed in December 2020, reviews program status as it relates to DAC participation, summarizes



current and planned efforts and lays out some categories of options for further consideration.

Recommendations fell into three broad categories:

1. Budget and incentive level strategies, such as carve-outs/set-asides, application deposit waivers, incentive step-down waivers and differential incentive structure in DACs.
2. Participation strategies, including conditional participant caps and quotas applied to participants to require a minimum share of projects in DACs.
3. Marketing, education and outreach strategies, including a potential referral program for properties in DACs, working with lead generation organizations for increased marketing to DAC owners or offering an award or prize for generating new DAC interest, applications or installations.

The SOMAH PA provided some overarching program considerations in relation to these categories of options, for example, the need to prevent a slowdown in applications, which could impede the program's attainment of its goal of 300 MW by 2030, and awareness around how potential strategies could increase program complexity, which may be counterproductive to efforts to increase program participant diversity.

Rather than recommend or propose any new specific measures outside increased and focused marketing efforts aimed at increasing DAC participation, this initial memo will inform additional stakeholder engagement and discussion, including with the CPUC, CBO partners and others. Following this stakeholder engagement period, the SOMAH PA will provide a second memo to deliver updated participation metrics, new benchmarks for DAC participation and a refined set of options following from additional research, discussion and consensus building, aimed at better serving California's most impacted communities.

## 5. Conclusions

Since its launch on July 1, 2019, the SOMAH program remains on track to reach the program's 300 MW goal. With considerable funding available in all territories, the program is well-positioned to accept increased participation in 2021 for both Track A and Track B projects. With the approval of progress payments, the SOMAH PA is hopeful that more property owners and contractors will opt to participate in the program given the additional support provided for the notable barrier of project financing.



In the second half of 2020, the SOMAH PA continued to build off strategy and adaption from Q1 and Q2 to best address the unforeseen challenges stemming from the COVID-19 public health crisis. The SOMAH PA continued efforts to assess, understand and address the impacts and challenges that key SOMAH audiences and stakeholders were facing (and continue to face) due to COVID-19. Working closely with the program's CBO partners, the SOMAH PA adapted and updated its ME&O tactics to make progress toward its ME&O objectives and overall program goals. Additionally, a new partnership with the CBO Self-Help Enterprises will enhance the team's capacity to reach more underserved and DAC communities in the Central Valley in 2021.

The SOMAH PA will also continue to prioritize safety and digital and distanced outreach and programming, thinking creatively about how to engage in a remote environment. The SOMAH PA has developed a deeper understanding of its audiences, refining audience segments and targeted tactics, messaging and marketing channels to effectively reach these segments.

Looking ahead, the SOMAH PA will continue working closely with the third-party evaluators through Phase II of the evaluation — furthering survey development and data collection to ensure collection of key information to evaluate program effectiveness and measure successes. Progress payment implementation will be a key activity for Q1 and Q2 2021. The SOMAH PA will report on the progress and results of the implementation in 2021 and beyond. As projects progress through the 18-month reservation period, the SOMAH PA looks forward to collecting and reporting more information for installed and interconnected projects.

## 6. Appendix A

As referenced in Section 3.1.1, Application and Incentive Statistics, below is the description of PowerClerk statuses.

### *Upfront Technical Assistance*

- Upfront Technical Assistance Request Submitted: Applicant has entered the required information and uploaded the Upfront Technical Assistance Request documentation for program administrator review.
- Upfront Technical Assistance Review: Upfront Technical Assistance Request is under review by the program administrator.
- Pending QA – Upfront Technical Assistance Request: The Upfront Technical Assistance Request has been reviewed by the program administrator and is pending quality assurance check.
- Suspended – Upfront Technical Assistance Request: Upfront Technical Assistance Request is incomplete or requires further action by the applicant. The program administrator sent correction information via email from the PowerClerk portal.
- Overdue – Technical Assistance Request Follow-up: The requested corrections for the Upfront Technical Assistance Request are overdue and should be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Resubmitted – Upfront Technical Assistance Request: The Upfront Technical Assistance Request has been resubmitted with corrections and is in queue for review by the program administrator.
- Upfront Technical Assistance Approved: Applicant has entered the required information and uploaded the reservation request documentation for review.

### *Reservation Request Milestone*

- Reservation Request Submitted: Applicant has entered the required information and uploaded the reservation request documentation for review.
- Reservation Request Review: Reservation request is in queue for review by the program administrator.
- Pending QA – Reservation Request: Reservation request is under final review by the program administrator.
- Suspended – Reservation Request: Errors were found during reservation request review and require corrections by the applicant. The program administrator sent correction information via email from the PowerClerk portal.



- Overdue Corrections – Reservation Request: The requested corrections for the Reservation Request are overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Resubmitted – Reservation Request: The reservation request has been resubmitted with corrections and is in queue for review by the program administrator.
- Pending Data Request: The application is in queue to be sent to the IOUs for electric usage data request.
- Pending IOU Data: Electric usage data has been requested from the IOU.
- Processing IOU Data: Electric usage data has been received and is under review by the program administrator.
- Pending Application Deposit: Reservation request is free of errors and pending receipt of the application deposit before moving to reservation approved status.
- Overdue – Application Deposit: The application deposit is overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Reservation Approved: Reservation request requirements have been met and the application deposit has been received. The project's funding will be reserved for 18 months, starting from the reservation approval date.

#### *Energy Efficiency Compliance Milestone*

- Overdue – Energy Efficiency Compliance Milestone: The Energy Efficiency Compliance Milestone is overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Energy Efficiency Compliance Milestone Submitted: Applicant has entered the required information and uploaded the Energy Efficiency Compliance Milestone documentation for review.
- Energy Efficiency Compliance Milestone Review: Energy Efficiency Compliance Milestone is in queue for review by the program administrator.
- Pending QA – Energy Efficiency Compliance Milestone: The Energy Efficiency Compliance Milestone has been reviewed by the program administrator and is pending quality assurance check.
- Suspended – Energy Efficiency Compliance Milestone: Errors were found during Energy Efficiency Compliance Milestone Review and require corrections by the applicant. The program administrator sent correction information via email from PowerClerk.
- Overdue Corrections – Energy Efficiency Compliance Milestone: The requested corrections for the Energy Efficiency Compliance Milestone are overdue and



must be submitted as soon as possible. Please contact the program administrator if assistance is required.

- Resubmitted – Energy Efficiency Compliance Milestone: The Energy Efficiency Compliance Milestone has been resubmitted with corrections and is in queue for review by the program administrator.
- Energy Efficiency Compliance Milestone Approved: Energy Efficiency Compliance Milestone requirements have been met.
- Pending Site Verification: Program administrator is completing a Site Verification. The application is held in this status until results are received and processed.
- Energy Efficiency Compliance Milestone Postponement Approved: The Energy Efficiency Compliance Milestone Postponement has been approved. The energy efficiency requirements must be submitted with the Proof of Project Milestone or Incentive Claim Package.

#### *Proof of Project Milestone*

- Overdue – Proof of Project Milestone: The Proof of Project Milestone is overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Proof of Project Milestone Submitted: Applicant has entered the required information and uploaded the Proof of Project Milestone documentation for review.
- Proof of Project Milestone Review: Proof of Project Milestone is in queue for review by the program administrator.
- Pending QA – Proof of Project Milestone: The Proof of Project Milestone has been reviewed by the program administrator and is pending quality assurance check.
- Suspended – Proof of Project Milestone: Errors were found during Proof of Project Milestone Review and require corrections by the Applicant. The program administrator sent correction information via email from the PowerClerk portal.
- Overdue Corrections – Proof of Project Milestone: The requested corrections for the Proof of Project Milestone are overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Resubmitted – Proof of Project Milestone: The Proof of Project Milestone has been resubmitted with corrections and is in queue for review by the program administrator.
- Proof of Project Milestone Approved: Proof of Project Milestone requirements have been met.



### *Incentive Claim Package*

- Overdue – Incentive Claim Package: The Incentive Claim is overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Incentive Claim Submitted: Applicant has entered the required information and uploaded the Incentive Claim documentation for review.
- Incentive Claim Review: Incentive Claim is in queue for review by the program administrator.
- Pending QA – Incentive Claim: The Incentive Claim has been reviewed by the program administrator and is pending quality assurance check.
- Suspended – Incentive Claim: Errors were found during Incentive Claim Review and require corrections by the applicant. The program administrator sent correction information via email from the PowerClerk portal.
- Overdue Corrections – Incentive Claim: The requested corrections for the Incentive Claim are overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Resubmitted – Incentive Claim: The Incentive Claim has been resubmitted with corrections and is in queue for review by the program administrator.
- Pending Inspection: Project has been selected for on-site PV system inspection and an on-site field inspection will be conducted. The application is held in this status until inspection results are received and processed.
- Incentive Claim Approved: Incentive Claim requirements have been met and inspection results have been processed (if applicable).
- Pending Payment: The application has been approved for payment. The application is pending payment and the status will change to Incentive Check Mailed status once payment has been issued.
- Incentive Check Mailed: The incentive check has been mailed and should be received by the payee within 30 days of the status date (check date).

### *Waitlist*

- Waitlist: Applicant has entered the required information and uploaded the Technical Assistance Request Form or reservation request documentation for program administrator review in a fully subscribed program.
- Waitlist: Upfront Technical Assistance Review: The Upfront Technical Assistance Request is in queue for review by the program administrator in a fully subscribed program.



- Waitlist: Pending QA – Upfront Technical Assistance Request: The Upfront Technical Assistance Request has been reviewed by the program administrator and is pending quality assurance check.
- Waitlist: Suspended – Upfront Technical Assistance Request: Waitlisted Upfront Technical Assistance Request is incomplete or requires further action by the applicant. The program administrator sent correction information via email from the PowerClerk portal.
- Waitlist: Overdue – Technical Assistance Request Follow-up: The requested corrections for the Upfront Technical Assistance Request are overdue and must be submitted as soon as possible. Please contact the program administrator if assistance is required.
- Waitlist: Resubmitted – Upfront Technical Assistance Request: The Upfront Technical Assistance Request has been resubmitted with corrections and is in queue for review by the program administrator in a fully subscribed program.
- Waitlist: Pending Data Request: The Upfront Technical Assistance Request has been reviewed by the program administrator and is in queue to be submitted to the IOU for historical electric usage data at the project site.
- Waitlist: Pending IOU Data: Electric usage data has been requested from the IOU and is pending review by the program administrator in a fully subscribed program.
- Waitlist: Processing IOU Data: The program administrator has received historical electric usage data for the project site from the IOUs and is processing the data.
- Waitlist: Upfront Technical Assistance Request Approved: Program administrator has reviewed and approved the Technical Assistance Request in a fully subscribed program. The project may now submit a Reservation Request Package.

#### *Other statuses*

- Canceled: The application is no longer eligible due to missing a deadline or project requirement. The project can be resubmitted with a new application at the current incentive rate.
- Withdrawn: Host customer or applicant requested that the application be removed and permanently marked with the inactive, withdrawn status. Withdrawn applications are moved to canceled status after 14 days.
- Unsubmitted: Applicant has started the application, but the information is incomplete and not fully submitted.

## 7. Appendix B

### SOMAH External Evaluation Phase 1 Recommendation, Program Administration Response

#### I. Background

Public Utilities Code (PUC) Section 913.8 requires the CPUC to provide the Legislature with a report on SOMAH program participation and progress toward legislative goals through a program evaluation. Phase 1 of the first program evaluation began in late 2019 and was completed when the final [Phase I Report](#) was published on August 27, 2020. The report outlines seven program findings and recommendations for the SOMAH PA and Energy Division consideration. The seven recommendations, along with the SOMAH PA responses and next steps, are outlined below.

#### II. Recommendation 1

##### A. Recommendation Details

Identify, define, and adopt terminology to refer to “disadvantaged communities” in the context of economic and workforce development. We note that an existing programmatic definition is provided in the SOMAH PA’s local and targeted hiring practices, which we will adopt in this report to define groups included in the broader definition of disadvantaged communities and refer to as “underserved communities”.

##### B. PA Response

**1.1** *Actionable:* The SOMAH PA commits to reviewing the program’s marketing materials to ensure that there is no ambiguity in the definition and characterization of DACs, as defined by CalEnviroScreen 3.0, a statewide tool that uses 20+ indicators to capture social, economic, and environmental burdens and is the tool that Environmental Justice (EJ) groups across CA, including community based organizations partnered with SOMAH, use to identify communities who have borne the most historic burden. The SOMAH PA will complete this review by the end of Q2 2021.

**1.2** *Actionable:* The program requirement in job training (encouraging but not requiring local/targeted hires) limits what the SOMAH PA can require; however, the PA has set goals for the participation of residents of DACs and other



“targeted hires<sup>9</sup>” through the program’s 2021 Marketing, Education, and Outreach Plan. The program’s 2021 ME&O Plan has set benchmarks for local and targeted hiring at 50%. Separately, the PA set a goal of ensuring that at least 50% of trainees are from CalEnviroScreen 3.0 DACs as the category of “targeted” hires is much broader. The SOMAH PA will continue reporting on the attainment of these objectives via Semi-Annual Progress Reports as data becomes available.

### **III. Recommendation 2**

#### **A. Recommendation Details**

The team notes that while the CPUC acknowledged the importance of hiring practices focused on local and underserved communities, it declined to adopt specific requirements around hiring and training practices. The SOMAH PA also emphasizes hiring practices that prioritize local and underserved individuals; however, there is a lack of clarity on how success of this endeavor will be measured.

**2.1** Consider setting goals and year-over-year benchmarks for trainees from the groups delineated by the SOMAH PA to provide insight into the program’s progress in training local and underserved groups.

**2.2** Explore ways to support and develop trainees from smaller contracting firms. In the spirit of broadly sharing the benefits of the program, explore the extent to which the SOMAH Program might provide additional workforce development to smaller contractors who can help diversify the overall participant pool.

<sup>9</sup> For the SOMAH program, “targeted hires” include residents of DACs, affordable housing residents, women, people of color, and other individuals who have faced or who have overcome at least one of the following barriers to employment: being homeless, being a custodial single parent, receiving public assistance, lacking a GED or high school diploma, participating in a vocational English as a second language program, or having a criminal record or other involvement with the criminal justice system.



## **B. PA Response**

*Overarching non-actionable:* It is not possible for the SOMAH PA to independently modify the workforce development requirements to apply to any intended populations, given that hiring local or targeted hires is encouraged but not required.

**2.1** *Actionable:* As stated in 1.2 above, the SOMAH PA tracks the number and percentage of job trainees who are residents of DACs, and also qualify as local or targeted hires, which is reported in the Semi-Annual Progress Report. Akin to the SOMAH PA response in 1.2, above, the SOMAH PA has set internal benchmarks for the percentage of total job trainees who also meet the local and/or targeted hire definitions.

**2.2** *Actionable:* The SOMAH PA has been exploring ways to support trainees as well as support smaller contractors in hiring trainees who qualify for SOMAH. The SOMAH PA member, GRID Alternatives, who leads the workforce development program component, is adding additional staff capacity in 2021 to foster trainee-contractor connections and support contractors in hiring, particularly targeting new program entrants. This hands-on approach to “customer care” will better support smaller contractors and contractors with less experience with or capacity to navigate the job training components of incentive programs.

In parallel, SOMAH PA will also extend one-on-one support to trainees who are inexperienced at or have faced barriers in entering solar industry traineeships. Through directly supporting trainee placements where desired by the contractor, the PA will have more of a direct influence on ensuring a high proportion of trainees are local and targeted hires and/or residents of DACs. Finally, in continuing to leverage SOMAH's Job Training Organization Task Force, the PA will identify and develop additional tools and services as necessary to support smaller contractors in recruiting eligible trainees to meet SOMAH's job training requirements.

## **IV. Recommendation 3**

### **A. Recommendation Details**

**3.2** In Phase II of the evaluation, the PA and evaluators should explore program participation barriers small contractors face and whether setting caps on large solar contractor applications would help ensure participation among property owners and a more diverse set of contractor applications. Additionally,



research should be conducted to better understand the extent to which large contractors may be employing the smaller contractors as subcontractors for SOMAH projects.

**3.3** In future evaluations, consider conducting interviews with contractors who have completed projects and who have the eligibility training but have not participated in the SOMAH Program to understand participation barriers.

**3.4** Future evaluations should consider conducting interviews with property owners who have been approached by the SOMAH PA or their CBO partners, or who have registered interest in SOMAH, but have not submitted an application to assess whether current outreach is sufficient to successfully introduce property owners into the program and through the application process. If it is deemed insufficient, identify ways to restructure outreach and/or technical assistance to bring more property owners into the application pipeline.

**3.5** In Phase II of the evaluation, explore the degree to which program financing and access to capital is a barrier to participation for smaller contractors and property owners who are unable to float the cost of the system until the incentive is paid in full.

## **B. PA Response**

**3.1** *Actionable:* The SOMAH PA collects demographic information on eligible contractors after they have completed the program's Eligible Contractor Training. The SOMAH PA will compare the metrics currently collected by the program and compare them to the metrics called for in SB 255. If there are metrics that are listed in SB 255 that the program does not currently collect, the SOMAH PA will consider adding the additional metrics to the eligible contractor intake form and requesting the additional data from current eligible contractors.

**3.2** *Non-Actionable:* With program funding available in all five program territories, there is ample opportunity for smaller contractors to apply to the program and reserve funding. With the funding available, the SOMAH PA does not see how a contractor cap on larger contractors would increase the opportunity for smaller contractors to participate and therefore does not support a contractor cap at this point in the program. If measures that limit participation by the program's most active contractors are considered in the future program years, the SOMAH PA believes each measure must be carefully considered for their potential impact on achieving the program's 300 MW goal.



*Actionable:* The SOMAH PA will track subcontractor participation, which will be known at the Proof of Project Milestone, to monitor the program's contractor diversity.

**3.3** *Actionable:* The SOMAH PA will provide the program evaluator information on the Eligible Contractor Training and intake process to support contractor interviews.

**3.4** *Actionable:* The SOMAH PA provided the third-party evaluator four customer journey maps, including one for tenants, contractors, property owners that receive TA, and property owners that do not opt for TA. The customer journey maps may assist the third-party evaluator in their interviews with program participants.

**3.5** *Actionable:* The SOMAH PA will develop a survey for contractors and property owners that opt-in to the recently approved two-payment incentive pathway to better understand how the introduction of progress payments has/has not helped break down barriers to program participation.

## **V. Recommendation 4**

### **A. Recommendation Details**

In Phase II of the evaluation, explore the gap between applicants who qualify as serving DACs and properties that qualify under income thresholds. There is still much that is unknown about the differences between these two program-eligible populations, and thus a comparison of those that do and do not qualify for one category or another can shed light on any qualitative and/or material differences between the two groups. By understanding how the buildings, neighborhoods, and tenants' experiences differ across categories, the SOMAH Program will better grasp how the program funds are being allocated to disadvantaged and low-income populations and the extent to which it meets the spirit of the legislation.

### **B. PA Response**

*Overarching non-actionable:* The word "gap" seems like a miscategorization and can create a false dichotomy. While the PA is committed to prioritizing DACs in the program, both qualification types (i.e., properties that qualify as being located in a DAC and properties that qualify under income thresholds) are eligible program participants.



*Actionable:* The California Housing Partnership, the SOMAH PA member lead for affordable housing analysis, will continue refining the market analysis included in the program's annual ME&O Plan. This analysis will allow the PA to continue to examine participating housing types (i.e., retirement homes, tribal communities, low-income qualified tenants, Section 8 project-based voucher units, etc.), and will look further at DAC properties. Further, the program's ME&O plan includes concrete actions for increasing property owner diversity and the participation of DAC properties.

## **VI. Recommendation 5**

### **A. Recommendation Details**

Create additional fields in the program tracking database to facilitate tracking and reporting on key program metrics. These fields would include items such as:

**5.1** Reason for program suspension. Currently, this information is only stored in the letters that are sent to program applicants. Adding primary reasons as a dropdown field in the program tracking database would allow for more rapid identification and resolution of application issues.

**5.2** Reason for program cancellation. The evaluation team found that nearly half of the SOMAH cancellations, nine of the 23 cancellations to date, were due to duplicate applications. Having a field to identify the primary reason for application cancellation would allow for an improved understanding of the current program status.

**5.3** Additionally, identify a process by which any large errors encountered within the database related to PV capacity sizing or incentive reservation amount can be rectified in a more timely manner to free up funding for waitlisted projects and improve the accuracy of reported program capacity and incentive funding.

### **B. PA Response**

**5.1** *Actionable:* The SOMAH PA has developed a report in PowerClerk that the program evaluator can access to display the reasons for program suspension. While this is not an additional drop down field in PowerClerk, the program evaluator will be able to more quickly access and digest the reasons for suspension.



**5.2** *Actionable:* In August 2020, the SOMAH PA added an additional field in PowerClerk to track the reason for program cancellation.

**5.3** *Non-Actionable:* The SOMAH PA has developed a process to check each project's system size as compared to the past 12-months of consumption data. While the SOMAH PA completes this process, there may be projects that are oversized and therefore reserving more funding than needed. The SOMAH PA is committed to working with the IOUs to streamline the data request process to reduce processing time and make funds available to projects on the waitlist in a more timely manner.

## **VII. Recommendation 6**

### **A. Recommendation Details**

The SOMAH PA should work with the IOUs to ensure the consumption data provided during the Reservation Request step allows the PA to make an accurate determination of appropriate PV system size. At a minimum, this would include information on tenant occupancy level (**6.1**) and dates corresponding to the monthly consumption fields (**6.2**).

### **B. PA Response**

The SOMAH PA presented Recommendation 6 to the Investor-Owned Utilities (IOUs) at the December IOU Working Group.

**6.1** *TBD-Actionable:* Before determining if this recommendation is actionable or not, the SOMAH PA would like to understand if this information can be compiled in an accurate and efficient manner. Because each IOU has a unique data request process, with varying barriers, this recommendation may not work for all program territories. The SOMAH PA will work with each IOU to explore the recommendation and how it might work for their individual territory and internal processes. After these consultations have concluded, the SOMAH PA will aggregate the information from the IOUs and determine if this recommendation is actionable.

**6.2** *Actionable:* Most of the IOUs already provide the dates corresponding to the monthly consumption fields, and the SOMAH PA has requested the remaining IOUs to include this information going forward.



## **VIII. Recommendation 7**

### **A. Recommendation Details**

A formal data collection process should be established to ensure data elements are retained as needed for future evaluation efforts. If this is considered out of the scope of the SOMAH PA, it may be necessary to contract with a third party to collect and process data elements on a regular basis or develop a process with the IOUs to house and make available to evaluators the data they collect for billing purposes

### **B. PA Response**

*Actionable:* The SOMAH PA will work with the program evaluator to inventory all the data points that need to be collected for future evaluations, along with where the data will be collected from (IOUs, PowerClerk, etc.) and the format to ensure the data is ready to evaluate. Additionally, the SOMAH PA will work with the IOUs to collect the data identified in the data inventory.

## **IX. Conclusion**

In its efforts to continuously improve the SOMAH program, the PA appreciates its partnership with the third-party evaluators and will continue to build upon the program adjustments they recommended. The SOMAH PA continues its own internal data collection and analysis of the program through the Semi-Annual Progress report. Further feedback and insight will be available upon completion of Phase II of the third-party evaluation, due for completion in March of 2021.