Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies

Study Title: Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs
Program: Disadvantaged Communities Green Tariff and Community Solar Green Tariff
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1	70 to 71	The main barrier to program implementation based on this research was the low number of solar developer responses to DAC-GT and CSGT solicitations. While PG&E has seen modest success in its solicitations for capacity, other PAs have had less success. In some cases, no responses were received to solicitations (e.g., SDG&E and SCE) despite SDG&E having almost as many contacts in its solicitation list as PG&E. In other cases, bids were received but were non-conforming (e.g., SCE). The relative success of PG&E may be in part due to it having a larger service territory that may have had solar developers with interconnection studies already begun at the time an RFO was released. Our outreach to solar developers from PA contact lists for a web survey yielded a low number of responses and identified many contacts that do not identify as solar developers. Lists from PAs also rarely had the same contacts, suggesting there are contacts that are only hearing about one of many PA solicitations. Only a quarter of responding solar developers reported that they reviewed the RFOs at all, suggesting that low awareness and interest may be contributing to the lack of responses to RFOs. The solar developers who *were* aware of RFOs reported challenges related to: • **Timeline and interconnection:** Solar developers reported that if there is no interconnection study in progress at the time of a solicitation, they need a longer timeline to be able to submit a bid to ensure they can complete an interconnection study.	**1.1A:** The PAs should devote additional marketing and outreach efforts towards informing solar developers of bid opportunities to improve engagement and bid response. This may be more efficiently done by a centralized organization.	Other	**PA Response:** PG&E recommends the commission weigh the pros and cons of such a coordinator, and requests to be exempted from the administrative effort and cost of creating such an organization as it is nearing fully procured status. It is important for limited procurement resources to be used to greatest effect toward meeting both the state's reliability, carbon reduction and equity goals. While PG&E believes centralization can provide benefits and streamline processes, PG&E is concerned that the recommendation for centralization is based on extremely low response rates from solar developers (e.g., ~1% of PG&E contacts). This information may not represent the population of solar developers and may not be adequate to base recommendations on process/program changes, namely centralizing solar developer outreach/solicitation. If there is centralization, the PAs should have an option to participate in the centralized solicitation process. There remain open questions to be resolved prior to centralizing the process such as: (0) will increased awareness address root causes of developer lack of response? (1) What structure will the centralized solicitation process take? (2) Who will run a solicitation and contract with this entity? And who will be executing contracts with developers? (3) Who will be negotiating terms and conditions? (4) What additional costs/resources would be required to initiate this process? (5) What cost recovery mechanism would be used, especially light in light of LSEs that have partially or fully met their procurement obligation? Additionally, PG&E suggests the benefits of this coordinator be reviewed in comparison to the value program implementors can provide on their own given the additional costs and complexities associated with pursuing this as an option. PG&E notes that solar developers, through their industry organization did note that they "do not believe the [CS-GT program] would lead to any developer-led projects," as summarized in D.18-06-027. It is possible that the primary barrier developers face is not awareness or understanding, but instead that the lack thereof stems from a focus on more promising opportunities. **Stakeholders:** IOUs, Solar Developers, CSGT Community Sponsors, CCAs **Timeline:** Likely aligned with the Application for Review.

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2		• **Siting and land costs**: We heard from solar developers that land costs present a barrier to proposing projects in the DACs and within the 5-mile surrounding boundaries of the DACs.	**1.1B**: PAs should invest time and resources into further developing their contact lists for potential solar developers. They could also coordinate efforts and share contacts to maximize their reach.	Other	**PA Response:** Same as above. **Stakeholders:** Same as above **Timeline:** Same as above
3			**1.1C:** The PAs should conduct solicitations for solar resources on a schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers).	Other	**PA Response:** Same as above. **Stakeholders:** Same as above **Timeline:** Same as above
4	72-73	With multiple PAs taking on similar activities, our evaluation identified key opportunities to streamline and combine efforts with the main focus on solar developer- and community-sponsored outreach and the solicitation process. Evergreen identified two areas where the program may benefit from a centralized coordinator taking on certain roles that are currently performed by each individual PA. ○ Solicitation Process and Outreach ○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	**1.3A:** The CPUC and/or the administrators should fund and convene a coordinating organization to market solicitations, match solar developers to community organizations and provide best practices to community organizations that want to sponsor CSGT projects. This coordinating organization should: ○ Centralize marketing and outreach to inform solar developers of bid opportunities across the PAs to increase awareness of and response to RFOs. ○ Invest time and resources into engaging with the solar developer market to increase awareness of the programs and expand developer contact lists. ○ Conduct solicitations for solar resources on a predictable schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers). ○ Inform and engage with potential community sponsors about CSGT bid opportunities.	Other	**PA Response:** Same as above. **Stakeholders:** Same as above **Timeline:** Same as above
5	74	Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.	**1.4A**: CPUC: We recommend that similar to DAC-SASH (another program that focuses on DAC customers in single-family homes), the DAC-GT and CSGT programs should expand such that residents in California Indian Lands (i.e., lands within the limits of an Indian reservation and under the jurisdiction of the US government) are eligible for program offerings. This places the program in alignment with Decision 20-12-003, which expanded DAC-SASH in the same way, to align that program with the same underlying statute.	Other	**PA Response:** PG&E does not oppose this alignment, and notes the importance of leveraging learnings and processes from other programs that target tribal customers, as it can be challenging to determine eligibility. **Stakeholders:** CCAs, IOUs, CSGT community sponsors, solar developers, tribal leaders, customers **Timeline:** Likely aligned with Application for Review

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6	71	Auto-enrollment allows money spent on marketing and outreach to instead become available to pay for the customer bill discount and allows for targeting of customers who are at higher risk of disconnection or who have higher bills. Auto-enrollment also allows a way around participation barriers that may make it harder for some customers to learn about the programs.	**1.2A**: CPUC: Consider using auto-enrollment for all PAs going forward for the DAC-GT program.	Accept (With modification)	**PA Response:** PG&E expects to propose auto-enrollment as a means of supporting project launch for CS-GT programs and as a means of supporting full program subscription for CS-GT and DAC-GT. PG&E notes that five CCAs, in resolution 5124, are provided flexibility to use auto enrollment that is consistent with the spirit of Decision 20-07-008. **Stakeholders:** CSGT Community Sponsors, IOUs, CCAs, CSGT developers **Timeline:** Aligned with Application for Review
7	74	Because most PAs had not yet launched the CSGT program at the time of the data request we sent to PAs, and because those that had successfully contracted CSGT programs had not yet begun construction, PAs were not able to provide us with specific estimates of the number of job trainees or specific workforce development metrics and goals.	**1.5A**: The PAs should require that workforce development attestations include hiring and training metrics, goals, and outcomes.	Other	**PA Response:** PG&E is generally supportive of greater clarity on workforce-related metrics and goals for these programs before requesting additional commitments from project developers. Many recommendations from the evaluation are geared towards improving the responses to RFOs, and additional reporting and tracking requirements adds complexity to the already complicated RFO process and may slow progress towards the desired outcome of procuring resources for these programs. Should the commission take this recommendation, the models and best practices from other programs that have focused on workforce issues would be critical. This data is generally very difficult to gather and validate. **Stakeholders:** CPUC, IOUs, Job Trainees, Solar developers, CSGT sponsors **Timeline:** Aligned with PAs procurement plans
8	75	This evaluation was intended to develop an evaluation framework including establishing metrics for assessing whether the programs are meeting their intended goals. We developed logic models and associated metrics for both programs. To assess the current and future evaluability of both programs, we categorized the 24 developed metrics (which tie to outcomes in the logic model) based on our ability to evaluate them. We were able to fully or partially evaluate more than two-thirds of the metrics. The metrics that require additional data are listed below. **Metric C2. Number of bids received per RFO**. Currently, we are unable to assess if solar developers are meeting the needs outlined in the RFOs and the full number of projects included in each response for all PAs. This number was available upon follow up from PG&E and was included in Independent Evaluator reports for SCE.	Where we were unable to assess metrics, we made recommendations for additional data that PAs should track to facilitate future evaluation of program achievements. We recommend PAs track the items below: **2.1A:** # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.	Reject	**PA Response:** This information is generally considered market-sensitive. **Stakeholders:** IOUs, solar developers **Timeline:** N/A

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9	75	**Metric C3. Number and type of project sponsors (CSGT only).** We heard reports of challenges connecting to sponsors, and a review of documentation and materials could help identify what barriers may exist to more robust engagement of potential sponsors.	**2.1B**: Track outreach done with potential sponsors, messaging and materials used for that outreach, and sponsors contacted. Would be helpful to review event dates, number and type of attendees, and type of outreach done prior to event.	Other	**PA Response:** PG&E has seen success in establishing procurement contracts with developers and in building relationships with the associated sponsors for its upcoming CS-GT projects. PG&E is also fully procured energy to its program MW cap. Given the limited ability to translate any potential findings into future RFO and or community sponsor engagement activities, tracking this data for PG&E does not appear beneficial. **Stakeholders:** IOUs, solar developers, CS-GT sponsors **Timeline:** N/A
10	75	**Metric C4. Results from program in both costs and benefits: number of MW installed/costs. Metric C5. Results from program costs compared to non-program PV costs.** Current MW data are only for the cost of bringing in solar developers and selecting bids. Other program data include the cost of the MW acquired. Additionally, **if interested in evaluating program MW allocation**, need to define the amount of cost burden the program is willing to place on non-participants. Any comparison to other programs should take into account that non-participant cost is partially balanced by the non-participant experiencing the benefit of a cleaner grid.	**2.1C**: Investigate possibility of getting cost/MW installed from solar developers	Other	**PA Response:** This information is generally considered market-sensitive. Above-market cost could, in aggregate, be used for cost-effectiveness evaluation. **Stakeholders:** IOUs, CCAs, customers, CSGT sponsors, CSGT solar developers **Timeline:** N/A
11	76	**Metric E2. Share of enrolled customers aware of specific program features**. Future evaluations should also account for program attrition and compare attrition between auto-enrolled customers and opt-in customers.	**2.1D:** Track rates of attrition for program enrollees.	**Accept**	**PA Response:** PG&E tracks program attrition for purposes of ensuring full subscription. However, the program is currently not open for new customer enrollment. The CS-GT programs have also not launched projects yet either for which to provide a basis for this analysis**.** **Stakeholders:** IOUs, CCAs **Timeline:** N/A
12	76	**Metric P1. Number and location of eligible customers enrolled**. Location of DAC-GT and CSGT generation would facilitate a geospatial analysis of program coverage across the state, including the geographic spread of participating customers. These data are available from both CCAs and SCE in quarterly reports but are not available across all PAs.	**2.1E**: Report on location of DAC-GT and CSGT generation. This is not done by all PAs at this time.	Other	**PA Response:** PG&E is supportive of consistent program reporting across all program implementors, where appropriate. **Stakeholders:** CCAs, IOUs, CSGT community sponsor **Timeline:** Future quarterly report

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13	76	**P5. Additional participation in other clean energy programs.** Customer self report data was inaccurate and future evaluations should rely on CIS data to ensure more accurate estimates are made. **P4. # of master metered customers participating in the CSGT program.** Master metered data are only relevant for CSGT, which had no actively enrolled customers at the time of this evaluation.	**2.1F:** Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only). **2.1G:** Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.	Other	**PA Response:** PG&E is generally supportive of tracking program participation in ESA or SJV pilot programs but also realizes there would be some level of additional program management and analysis to get to this information. If this were a valuable element to include, do so with understanding of the cost-benefit relationship for doing so on a regular cadence. **Stakeholders:** IOUs, SJV program stakeholders, customers **Timeline:** Likely aligned to the subsequent evaluation
14	76	**J1. # of leveraged job training programs.** At the time of this evaluation, it was too soon to estimate the number of job training programs leveraged. These data need to be tracked first by workforce development partners rather than by PAs.	**2.1H:** Track job training programs used in the process of solar project development, including the training dates, curricula, and the number of trainees engaged with given programs.	Other	**PA Response:** Same comment as item 7. **Stakeholders:** Same comment as item 7. **Timeline:** Same comment as item 7.
15	77	The large number of Program Administrators makes data review and collection cumbersome (multiple NDAs for instance) for evaluators and also creates a challenge for CPUC staff to track progress between evaluation cycles, which occur on a triannual basis. The same coordinating organization that handles the solar developer coordination could also take on a centralized data collection effort, or another organization could (e.g., one of the PAs or IOUs).	**2.1I**: We recommend the CPUC weigh the pros and cons of such a coordinator that could create a central website where information could be submitted and ensure that submitted information is similar across PAs.		**PA Response:** Regarding a centralized data collection effort, PG&E also recommends the CPUC weigh the pros and cons of such a coordinator. PG&E suggests including for consideration, leveraging existing reporting methods such as the DG stats web portal to submit DAC data on a quarterly basis in lieu of the quarterly filing of the DAC progress report to avoid redundancy and eliminate creation of a new data platform specific to this program. This would incorporate data into an existing, centralized location and create consistency across the program administrators. The intent of this seems to be a consolidation of progress in consistent ways across the state; DG stats is a strong, existing location for data (contingent upon this replacing a quarterly filing); provides data in a more useful way in aggregate across all administrators. **Stakeholders:** CCAs, IOUs, CSGT community sponsors **Timeline:** Changes to reporting requirements are likely tied to the Application for Review timing as these are currently ordered in a commission decision.

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16	77	In some cases, there is still a lack of clarity on goals for the program's expected outcomes. For example, for the metric of "capacity procured and online by program PA," it would be helpful to set a goal for how much capacity should be procured online by the end of an evaluation period. These are mapped to metrics and outcomes in Table 32 of the report.	**2.2A**: CPUC to clarify: How much capacity is expected on what timeline?	Other	**PA Response:** PG&E supports additional clarity on the primary objective of these programs and how to know when that objective is met. As a starting point, the origin of this program is the statutory objective to grow solar among residential customers in DACs. At minimum it would help to clarify whether the primary objective is to benefit participating customers or to increase solar development. **Stakeholders:** IOUs, CCAs, CSGT community sponsors, solar developers **Timeline:** N/A
17	77		**2.2B**: CPUC to clarify: What is the minimum acceptable number of conforming bids, and how many conforming bids would be ideal?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
18	77		**2.2C**: CPUC to clarify: What level of awareness of the program by participants is ideal? Is awareness of benefit an integral part of the program?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
20	77		**2.2E**: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
21	77		**2.2F:** CPUC to clarify: Is a goal of the program to reach customers in specific segments (such as households with primary languages other than English, certain household compositions, or households receiving utility assistance)?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.

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22	78		**2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	**PA Response:** Same as above. In addition, PG&E notes that this metric may not be applicable across all PAs of vastly different sizes and states of program maturity. **Stakeholders:** Same as above. **Timeline:** Same as above.
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
24	78		**2.2I**: CPUC to clarify: What percentage of customers would the program expect to see who feel that they are contributing to renewable energy?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
25	78		**2.2J:** CPUC to clarify: What percentage of customers would the program like to achieve in terms of customers feeling like the program reduces GHG emissions?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.

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28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	**PA Response:** Same as above. **Stakeholders:** Same as above. **Timeline:** Same as above.
29	78-79	This evaluation was conducted when it was too soon to take on the following evaluation activities.	**2.2N**: For future evaluations, the following should be prioritized: • On-site verification of solar project performance through methods such as monitoring energy generation; • An economic and job impact assessment; and • An assessment of the impacts from the changes in funding sources that will begin during the year 2022.	Other	**PA Response:** At the time of the next program evaluation, these items may or may not be beneficial. PG&E notes that to the extent that additional evaluation scope would require additional monitoring, tracking or reporting as part of regular program administration, these will increase the administrative cost of the program and may make resource procurement even more difficult (for example if developers must install additional equipment or do additional reporting). PG&E also suggests with this recommendation for additional metrics to track that there be a review of program cost effectiveness using a standard cost effectiveness method. **Stakeholders:** Project developers, community sponsors, IOUs, CCAs, job trainees, **Timeline:** Aligned with future triennial evaluation.
30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solicitations; this group was much smaller than expected, with just a quarter of survey respondents reporting having reviewed at least one program RFO.	**2.2O**: CPUC: We recommend conducting a study of the broader market of solar developers focused on sharing the range of possible RFO features with respondents to assess what the major challenge points are that limit RFO participation such as land costs, siting, and interconnection barriers.	Other	**PA Response:** PG&E generally supports learning from other community solar models, especially those that reduce complexity and provide additional flexibility **Stakeholders:** Solar project developers, community sponsors, IOUs, CCAs **Timeline:** N/A