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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Link to Report: TBD

				CLEAN POWER ALLIANCE ("CPA")	
Item #	**Page #**	**Findings**	**Best Practice / Recommendations**	**Disposition**	**Disposition Notes**
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1	70 to 71	The main barrier to program implementation based on this research was the low number of solar developer responses to DAC-GT and CSGT solicitations. While PG&E has seen modest success in its solicitations for capacity, other PAs have had less success. In some cases, no responses were received to solicitations (e.g., SDG&E and SCE) despite SDG&E having almost as many contacts in its solicitation list as PG&E. In other cases, bids were received but were non-conforming (e.g., SCE). The relative success of PG&E may be in part due to it having a larger service territory that may have had solar developers with interconnection studies already begun at the time an RFO was released. Our outreach to solar developers from PA contact lists for a web survey yielded a low number of responses and identified many contacts that do not identify as solar developers. Lists from PAs also rarely had the same contacts, suggesting there are contacts that are only hearing about one of many PA solicitations. Only a quarter of responding solar developers reported that they reviewed the RFOs at all, suggesting that low awareness and interest may be contributing to the lack of responses to RFOs. The solar developers who *were* aware of RFOs reported challenges related to: • **Timeline and interconnection:** Solar developers reported that if there is no interconnection study in progress at the time of a solicitation, they need a longer timeline to be able to submit a bid to ensure they can complete an interconnection study. • **Siting and land costs**: We heard from solar developers that land costs present a barrier to proposing projects in the DACs and within the 5-mile surrounding boundaries of the DACs.	**1.1A:** The PAs should devote additional marketing and outreach efforts towards informing solar developers of bid opportunities to improve engagement and bid response. This may be more efficiently done by a centralized organization.	Rejected	**PA Response: CPA agrees in principle with the recommendation to devote additional ME&O efforts towards interacting with project developers, but note that implementation of this recommendation is constrained by an annual 4% ME&O cost cap.** **CPA rejects the recommendation to create a centralized organization to conduct outreach to project developers. Further explanation is provided in the disposition notes for item #4 below.** **Stakeholders:** **Timeline:**
2			**1.1B**: PAs should invest time and resources into further developing their contact lists for potential solar developers. They could also coordinate efforts and share contacts to maximize their reach.	Other	**PA Response: Recommendations for increasing time and resources into developing contact lists for potential solar developers must coincide with a reconsideration of the 10% program administration budget cost cap (and possibly the 4% ME&O budget cost cap should Program Administrators use external resources to implement this recommendation). Program Administrators would also benefit from suggestions for engagement strategies with solar developers pursuant to this recommendation. An increase in solar developer engagement does not change the larger barriers for developers that have been recognized by stakeholders such as space and geographical location in relation to the customer base.** **CPA is still considering the recommendation to coordinate outreach efforts and sharing contacts with other Program Administrators.** **Stakeholders:** **Timeline:**

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3			**1.1C:** The PAs should conduct solicitations for solar resources on a schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers).	Accepted	**PA Response: CPA also believes a longer RFO bid window would increase the number of interactions with project developers and solicitations. Accordingly, CPA launched its most recent RFO on December 8, 2021 with bids from project developers due by June 1, 2022.** **Stakeholders:** **Timeline:**
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.	Rejected	**PA Response:** **Program Administrators offer regionally specific approaches in engaging with potential community sponsors and solar developers. The CSGT program would be better served by retaining the existing ME&O structure because Program Administrators already have relationships with potential community sponsors. Requiring such organizations to interface with an additional entity, such as the proposed centralized coordinator, would lengthen and complicate a process that already presents challenges to prospective bidders and community sponsors. Furthermore, community sponsors would likely engage with Program Administrators regardless of whether or not there is a statewide centralized coordinator, thus this recommendation would add bureaucratic layers and expenses without necessarily streamlining the bidding process.** **With respect to conducting solicitations, the communities impacted by the CSGT program would be better served by its local load-serving-entity (LSE) conducting solicitations on its behalf, rather than a centralized coordinating organization. CPA captures local community priorities in its solicitations (e.g. workforce development requirements) that a centralized coordinator would not be aware of. Having these priorities incorporated into the solicitations will make the likelihood of project success higher. In addition, CPA is already conducting solicitations on a regular basis and incorporating long RFO timelines to address siting and interconnection schedules.** **Stakeholders:** **Timeline:**
5	74	Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.	**1.4A**: CPUC: We recommend that similar to DAC-SASH (another program that focuses on DAC customers in single-family homes), the DAC-GT and CSGT programs should expand such that residents in California Indian Lands (i.e., lands within the limits of an Indian reservation and under the jurisdiction of the US government) are eligible for program offerings. This places the program in alignment with Decision 20-12-003, which expanded DAC-SASH in the same way, to align that program with the same underlying statute.	Accepted	**PA Response: A decision is required from the CPUC to implement this recommendation.** **Stakeholders: CPUC** **Timeline:**

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.	Rejected	**PA Response:** **The CPUC should not require auto-enrollment. As the Evaluation Report notes, the Independent Evaluator had "limited information" (pg. 144) and was only able to analyze a few months' worth of enrollment information from a single Program Administrator using self-enrollment processes before forming this recommendation. We recommend that the Independent Evaluator further analyze enrollment from multiple Program Administrators and consider important metrics such as participant attrition rates, awareness, and participant awareness or enrollment in other clean energy programs to more fully account for the value of self-enrollment.** **Further, neither of the stated rationales offered by the Independent Evaluator for mandating auto-enrollment of participants are substantiated.** **First, the recommendation to require mandatory auto-enrollment should not be predicated upon increased funds available for customer bills discounts and preventing disconnections. While the customer bill discount is an important aspect of the DAC-GT and CSGT programs, the primary purpose of the programs is to "promote the installation of renewable generation among residential customers in disadvantaged communities" as directed by state legislation (D.18-06-027 at pg. 2). The bill discount is not a goal of the program by itself, but rather a component "to encourage low-income customers in DACs to consider green options" (D.18-06-027 at pg. 2). Policy redesign recommendations must balance the benefits and costs of the primary policy objective of expanding residential use of renewable energy.** **Second, the Independent Evaluator contends that auto-enrollment would remove barriers that make it harder for some customers to learn about the program but CPA's internal research and the Evaluation Report both found that self-enrollment greatly enhances customer awareness of the program. Notably, the Independent Evaluator found that self-enrolled CPA customers had greater awareness about the DAC-GT program, clean energy, and local solar developments (among other categories) than PG&E customers that were auto-enrolled (Evaluation Report, pg. 148). This enhanced understanding of program objectives is critical to support the underlying purpose of the DAC-GT program: to increase the proportional usage of renewable energy in disadvantaged communities.** **Ultimately, automatic enrollment may be appropriate for some PAs and not for others. The CPUC should continue to allow this decision to be made on a case-by-case basis as determined by the circumstances of the individual PA.** **Stakeholders:** **Timeline:**

				CLEAN POWER ALLIANCE ("CPA")	
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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: Under further review.** **Stakeholders:** **Timeline:**
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.	Accepted	**PA Response: Results from RFOs can be provided to the Independent Evaluator. We suggest including data regarding number of bids selected and number of offtake contracts entered into as a result of a bid selected under an RFO.** **Stakeholders:** **Timeline:**
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: Under further review. The evaluator or other stakeholders should demonstrate the analytical value of reviewing outreach messaging and marketing materials before adopting this recommendation.** **Stakeholders: CPUC** **Timeline:**
10	75	**C4. Results from program in both costs and benefits: number of MW installed/costs.** **C5. Results from program costs compared to non-program PV costs.** Current MW data are only for the cost of bringing in solar developers and selecting bids. Other program data include the cost of the MW acquired. Additionally, **if interested in evaluating program MW allocation**, need to define the amount of cost burden the program is willing to place on non-participants. Any comparison to other programs should take into account that non-participant cost is partially balanced by the non-participant experiencing the benefit of a cleaner grid.	**2.1C**: Investigate possibility of getting cost/MW installed from solar developers	Other	**PA Response: The requested information may be already available. Cost of installed MW can be ascertained from executed DAC-GT and CSGT power purchase agreements submitted to the CPUC for approval (*see* Resolution E-5102, Ordering Paragraph 3) and comparison against non-program procurement costs can be obtained from the Above Market Generation Cost delta that is submitted in Program Administrators' annual budgets. General information on non-program renewable costs can be found in other publicly available sources, such as the PCIA RPS Benchmark.** **More importantly, it would be inappropriate for a Program Administrator or offtake agreement counterparty to share energy procurement costs with a central coordinator if such entity were a load-serving entity. Sharing confidential energy cost information would likely violate market competitiveness principles, data confidentiality requirements set forth in CPUC Decision 06-06-066, and contract confidentiality provisions.** **Stakeholders: Solar developers, energy market participants** **Timeline:**

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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.	Accepted	**PA Response: Attrition rates can be calculated from customer enrollment data provided in CPA's quarterly report. CPA will continue to provide enrollment statistics in its quarterly reports. Such information could be helpful in understanding the benefits of different customer enrollment approaches.** **Stakeholders:** **Timeline: Quarterly**
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.	Accepted	**PA Response: CPA will continue to provide location of generation resources in its quarterly reports.** **Stakeholders:** **Timeline: Quarterly**
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: Under review by CPA. It is unclear whether CPA can determine which customer participants are participants in other clean energy programs and/or master metered with currently available data. CPA will coordinate this data collection effort with Southern California Edison, per Resolution E-4999.** **Stakeholders: IOUs** **Timeline:**
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: Under review by CPA. CPA has not yet engaged with a workforce development partner.** **Stakeholders: Community sponsor, workforce development partner.** **Timeline:**
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.	Rejected	**PA Response: It may not be permissible to share information with a third-party coordinating organization under existing non-disclosure agreements and contract confidentiality provisions. While disclosure of information to the regulatory entity or their agent (as in the Independent Evaluator here) may be permissible under such provisions, disclosure to a third-party that may be a market competitor may not be permissible. Furthermore, disclosing such information to a centralized coordinator that is a market competitor would violate market competitiveness principles. Adding another party to the chain of custody of customer data also creates data privacy concerns.** **Stakeholders: Contract counterparties** **Timeline:**
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: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**

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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: It is unclear what is meant by a "minimum acceptable number of conforming bids."** **Stakeholders:** **Timeline:**
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?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
20	77		**2.2E**: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
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)?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
22	78		**2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	**PA Response: Evaluator recommendation requires clarification.** **Stakeholders:** **Timeline:**
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
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?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
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?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**

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28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
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.	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**
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.	Accept	**PA Response: Recommended for discussion in Application for Review process.** **Stakeholders:** **Timeline:**