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. • **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.	Other	**PA Response:** PCE is not opposed to implementing more outreach to ensure developers are aware of the programs as long as it is certain that these additional efforts explain any lack of bid responses. PCE had not closed its RFO during the data collection phase of the evaluation but did end up receiving multiple bids for DAC-GT projects and anticipates completing an agreement in this first round of bidding. This RFO also included the CSGT program, which received no bids. PCE would then conclude that knowledge of the RFO is not the barrier to bids for the CSGT program and instead that there are other factors that explain why they did not submit CSGT bids. **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:** See above. PCE's list of developers was sufficient to solicit several bids from its first RFO for the DAC-GT program, but no developers submitted CSGT bids. **Stakeholders:** **Timeline:**
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:** PCE is open to exploring extending future program solicitations but will need more time to ensure that PCE can make an informed decision on the issue as we have only conducted one solicitation for these programs. **Stakeholders:** **Timeline:**

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4	72-73	With multiple PAs taking on similar activities, our evaluation identified key opportunities to streamline and combine efforts with the main focus on solar developer- and community-sponsored outreach and the solicitation process. Evergreen identified two areas where the program may benefit from a centralized coordinator taking on certain roles that are currently performed by each individual PA. ○ Solicitation Process and Outreach ○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	**1.3A:** The CPUC and/or the administrators should fund and convene a coordinating organization to market solicitations, match solar developers to community organizations and provide best practices to community organizations that want to sponsor CSGT projects. This coordinating organization should: ○ Centralize marketing and outreach to inform solar developers of bid opportunities across the PAs to increase awareness of and response to RFOs. ○ Invest time and resources into engaging with the solar developer market to increase awareness of the programs and expand developer contact lists. ○ Conduct solicitations for solar resources on a predictable schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers). ○ Inform and engage with potential community sponsors about CSGT bid opportunities.	Reject	**PA Response:** PCE questions whether there is clear evidence to support the outsourcing of these efforts to a coordinating organization for a few reasons. (1) DAC-GT solicitations have received bids and a few PAs have signed contracts for new projects, indicating they are receiving and reviewing solicitation materials. (2) CCAs were originally created to serve as energy procurement agencies, are very experienced in energy procurement and have signed contracts for almost 10,000 MW of new-build clean energy resources (https://cal-cca.org/cca-impact/). (3) CCAs, as local agencies that regularly coordinate with other local non-profit organizations on various efforts (e.g. program design, program delivery, program ME&O, customer enrollment, general community outreach and education in clean energy technologies), already have strong connections to CBOs and other entities that can serve as program sponsors for CSGT projects. (4) The Evaluator's Report only included detailed data collection from 3 PAs, whereas there is now 5 more who have launched and closed solicitations which were not included in the recommednations of the report. (5) With the above considerations in mind, it is not clear that a central coordinating organization would lead to greater achievement of the program goals. (6) Costs of funding that agency would burden the PAs' budgets and count against the Administrative Cost Caps without certainty that a central coordinating agency would achieve greater success. (7) As CCAs have smaller program capacity allocations than the IOUs, there is an inherent risk that a central coordination effort would disadvantage CCAs by not allowing them to conduct their own outreach to developers. (8) A central coordinator that is also a market participant would concern PCE about possible violation of market competitiveness principles. **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.	Accept	**PA Response:** PCE would support the CPUC considering the inclusion of residents in Californian Indian Lands as eligible under the DAC-GT and CSGT program rules. **Stakeholders:** CPUC **Timeline:**

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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.	Other	**PA Response:** PAs should be granted the flexibility to forgo auto-enrollment if desired and some PAs may use a combination of autoenrollment and manual enrollment. PAs should be given this autonomy to ensure that they are able employ enrollment processes that are most suitable for achieving the purposes of the programs within their service areas. **Stakeholders:** **Timeline:**
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:** PCE recognizes that workforce development is one of the goals of the CSGT program but would first request CPUC direction as to what level of detail in developer attestations would be consistent with programmatic goals. **Stakeholders:** CPUC **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.	Accept	**PA Response:** PCE would be willing to share the number of non-conforming bids and the number of proposed projects in those offers for the next triennial review. **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.	Reject	**PA Response:** PCE's CSGT program is still in its nascent stages and PCE has very strong connections to local organizations that can serve as community sponsors from years of coordination on delivery of, outreach for, and design of programs. For those reasons PCE feels it is not certain that the additional administrative burden of collecting these specific metrics would prove useful in evaluating PCE's success or in comparing PCE's program to that of other PAs when considering the likelihood of variation between events, materials, etc. **Stakeholders:** **Timeline:**

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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	Reject	**PA Response:** PAs already receive bids from developers that include the cost/MW installed, but PCE treats this as confidential information provided to the PCE by the developer. As it is market sensitive, PCE would not support disclosing cost/MW installed provided in bids and would only disclose such information inasmuch as it may be required when filing executed procurement contracts per Resolution E-5124. **Stakeholders:** **Timeline:**
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:** PCE would support the CPUC requiring the PAs to track attrition of program enrollees. PCE will continue to report enrollment figures in quarterly reports. **Stakeholders:** **Timeline:**
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.	Accept	**PA Response:** PCE will continue to report information related to the location of projects in quarterly and semi-annual reports. **Stakeholders:** **Timeline:**
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:** While PCE understands the intention of these metrics, these are not data fields that PCE has direct access to as they'd only be available through PG&E's billing system. As PG&E would have this data, the simplest process would be for the independent evaluator to request this data from PG&E for CCA customers. Note that the exception is that PCE would be able to share enrollment in other programs offered directly by PCE. **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:** Prior to directing PAs to collect more individual data and materials, PCE would ask that the CPUC stakeholders direction as to the specific goals related to workforce development to ensure that any additional data collection contributes directly to those aims. **Stakeholders:** Community sponsor, workforce development partner, CSGT project developer **Timeline:**

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15	77	The large number of Program Administrators makes data review and collection cumbersome (multiple NDAs for instance) for evaluators and also creates a challenge for CPUC staff to track progress between evaluation cycles, which occur on a triannual basis. The same coordinating organization that handles the solar developer coordination could also take on a centralized data collection effort, or another organization could (e.g., one of the PAs or IOUs).	**2.1I**: We recommend the CPUC weigh the pros and cons of such a coordinator that could create a central website where information could be submitted and ensure that submitted information is similar across PAs.	Reject	**PA Response:** As PCE has not yet participated in any meaningful data collection for the independent evaluator's report, we cannot yet speak to the process or what, if any, NDAs may be required. However, PCE does not support the creation of a coordinator for solicitation and engagement with community sponsors, and therefore does not believe that creation of a central coordinator specifically for data collection is warranted. In addition, any NDAs would still be necessary before disclosing sensitive information to a central coordinator, as it is for any purposes when PCE shares sensitive data with a third party. Also, the CPUC and the independent evaluator can track progress of the programs through the quarterly and semi-annual reports required of all PAs. In the event that the central coordinator is also a market participant, disclosing such information would violate market competitiveness principles. **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?	Accept	**PA Response:** PCE would support the CPUC setting goals for capacity interconnection by the next independent evaluator report. However, a single target for commissioning may not be appropriate when considering elements that are particular to each PA (e.g. capacity allocation, date of first solicitation). Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**
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:** PCE is unsure if setting a "minimum number of bids received per RFO" is meaningful metric due to differences in programs and PAs that will inherently affect developer enthusiasm (e.g. size of capacity allocation, land cost, density of development, etc). **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:** PCE would support the CPUC establishing what qualifies as participant "awareness." Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**

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19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response:** PCE would support the CPUC establishing what qualifies as participant "awareness," and clarifying the intent behind setting a goal of enrolled customer awareness if specific program features, and which program features the CPUC would like program to make them aware of. Recommended for discussion in the 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?	Other	**PA Response:** PCE is unsure if it is appropriate to set goals across the collective PAs for these still nascent programs related to prioritizing different eligible geographies for customer participation. Recommended for discussion in the 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)?	Other	**PA Response:** PCE is unsure if it is appropriate to set goals across the collective PAs for these still nascent programs related to specific characteristics of customers that are served by these programs. Recommended for discussion in the 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:** PCE is unsure how recommendation 2.2G would further the collection of metric P4 related to the # of master metered customers participating in the CSGT program. PCE notes that metric P4 is a required element of the CSGT semi-annual reports. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	**PA Response:** PCE is unsure if it is appropriate to set goals across the collective PAs for these still nascent programs related to prioritizing participation in other energy programs, which may not be equally available or suitable for individual participants. Recommended for discussion in the 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?	Other	**PA Response:** PCE is unsure if it is appropriate to set a specific percentage goal for the rate of participants share with a specific personal belief. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**

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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:** PCE is unsure if it is appropriate to set a specific percentage goal for the rate of participants share with a specific personal belief. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	**PA Response:** PCE is open to exploring how to design appropriate environmental benefit goals but is currently unsure without more context on how it is designed. For example, a goal of reducing carbon emissions associated with participants' electricity use would need to take into account that all of PCE's generation customers today receive 100% GHG-free generation. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	**PA Response:** PCE is unsure if it is appropriate to set a specific number of leveraged job trainings as it may not be as meaningful of a goal as workforce development outcomes. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**
28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	**PA Response:** PCE is unsure if it is appropriate to set a specific number of local job hires and trainees expected through the CSGT program as this type of outcome could be highly dependent on the size of the solar projects contracted to serve the program. Recommended for discussion in the 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.	Other	**PA Response:** PCE is generally supportive of the CPUC providing additional guidance for subsequent independent evaluator reports, which may include topics such as these. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**

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30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solicitations; this group was much smaller than expected, with just a quarter of survey respondents reporting having reviewed at least one program RFO.	**2.2O**: CPUC: We recommend conducting a study of the broader market of solar developers focused on sharing the range of possible RFO features with respondents to assess what the major challenge points are that limit RFO participation such as land costs, siting, and interconnection barriers.	Other	**PA Response:** PCE supports the CPUC assessing the barriers developers are experiencing in relation to this program, but any recommendation of a market assessment of solar developers that is broader than what is directly relevant to this program should be considered outside of this proceeding. Recommended for discussion in the Application for Review process. **Stakeholders:** **Timeline:**