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

				Marin Clean Energy (MCE)	
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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: Due to the difference in program sizes, MCE is concerned that a centralized agency may be more focused on the needs and parameters for the IOU's and may not take into consideration the variable circumstances of each CCA. Additionally, coordination with a centralized agency may result in PA's exceeding their 4% ME&O and 10% program administration budget caps.** **Stakeholders: Solar Developers** **Timeline: Ongoing until PPAs for both programs have been executed**
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: PA's can invest additional time and resources into developing their contact list, however, devoting additional resources to this effort may push ME&O budgets beyond their 4% cap.** **There also is concern about sharing their developer lists with others as this information may be proprietary.** **Stakeholders: Solar Developers** **Timeline: Ongoing until PPAs for both programs have been executed**
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).	Rejected	**PA Response: The suggested timeline is not be viable for MCE, and may be challenging for other PAs. MCE suggests that PA's having better communication around the RFO's would be more effective.** **Stakeholders: Solar Developers** **Timeline: Ongoing until PPAs for both programs have been executed**

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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.	Other	**PA Response:** **Requiring PA's to adhere to the central agency's timeline will create additional challenges to the procurement process.** **The recommendation to have the central agency engage with CBO's raises concern that the centralized agency may not be an effective partner for the CBO's as the PA's may already have established relationships with the CBO's.** **Stakeholders: Community Sponsor candidates, Solar Developers** **Timeline: Ongoing until PPAs for both programs have been executed**
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:** **Stakeholders: Program Participants** **Timeline: Ongoing**
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: MCE supports the CPUC recommending auto-enrollment for DAC-GT, but does not support mandated auto-enrollment. MCE supports evaluating the success of programs that have not auto-enrolled participants prior to making this suggestion a requirement.** **Stakeholders: N/A** **Timeline: Ongoing**
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.	Accepted with Caveats	**PA Response: The requirements for these metrics would need to be built into the contract with the developer.** **Stakeholders: Community Sponsor candidates, Solar Developers** **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.	Rejected	**PA Response: The relevant information is outlined in the RFO document. This appears to be a potentially burdensome reporting requirement with unclear benefits.** **Stakeholders: N/A** **Timeline:**

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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.	Rejected	**PA Response: This appears to be a potentially burdensome reporting requirement with unclear benefits.** **Stakeholders: N/A** **Timeline: Ongoing until a Community Sponsor is identified**
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	Rejected	**PA Response: It is likely that developers will not want to disclose this information. It would be challenging to get this data. This requirement would need to be included in contract between the PA and the developer.** **Stakeholders: Solar Developers** **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.	Other	**PA Response: Attrition may occur for a variety of reasons that are not captured in this rate (closed account, installed solar, no longer in CARE or FERA).** **Stakeholders: N/A** **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.	Accepted	**PA Response: This information can be made available in the quarterly and semi-annual reports.** **Stakeholders: N/A** **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.	Rejected	**PA Response: Cross-referencing participation in other customer programs may be a potentially burdensome reporting requirement with unclear benefits.** **Stakeholders: N/A** **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.	Rejected	**PA Response: MCE is concerned that CBO's will be resistant to this idea if they are responsible for developing and reporting this information as there is already concern about the requirements of them and the limited funding they will receive.** **Stakeholders: Community Sponsor candidates, Solar Developers** **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.	Rejected	**PA Response: MCE does not support the creation of a central agency for the reasons listed in our response to Item 1.** **Stakeholders: Solar Developers** **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?	Rejected	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: N/A** **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?	Rejected	**PA Response: MCE opposes this recommendation due to the existing challenge of procuring for the CSGT program; if the minimum threshold is not met, the PA would then have to reject bid(s) that may result in a PPA.** **Stakeholders: Solar Developers** **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?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: Program Participants** **Timeline: Ongoing**
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders:** **Timeline: Ongoing**
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: Requires further discussion & input from CPUC** **Stakeholders: Program Participants** **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: Requires further discussion & input from CPUC** **Stakeholders: Program Participants** **Timeline:**
22	78		**2.2G:** CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: Program Participants, Community Sponsor** **Timeline:**
23	78		**2.2H**: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: Program Participants, Community Sponsor** **Timeline:**

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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 Requires further discussion & input from CPUC** **Stakeholders: N/A** **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?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: N/A** **Timeline:**
26	78		**2.2K**: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: N/A** **Timeline:**
27	78		**2.2L**: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	**PA Response: Requires further discussion & input from CPUC** **Stakeholders: Community Sponsor, Solar Developer, Job Training Participants** **Timeline:**
28	78		**2.2M**: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	**PA Response: This should be dependent on project size.** **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: It is unclear why on-site verification of the solar project is needed; this information could be available through the meter-reading data. MCE would like clarity on the metrics for the assessments.** **Stakeholders: Community Sponsor, Solar Developers, Job Training Participants** **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.	Accepted	**PA Response:** **Stakeholders: Solar Developers** **Timeline:**