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

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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: PAs should still be the primary organization marketing their own solicitations according to the procedures determined by their governing bodies. However, a centralized entity can work in cooperation with PAs to market solicitations, if a PA believes it needs assistance. The CPUC DAC programs website has all PA solicitations listed and can be leveraged as a repository for future solicitations by linking to individual PA websites.** **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.	Accept	**PA Response:** **Stakeholders: PAs, project developers** **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).	Accept with Clarifications	**PA Response: Individual PAs should not be expected to issue RFOs at the same time (ex. July 1 each year). However, a minimum solicitation period that PAs must keep their RFOs open for could provide developers (ex. at least 6 months) with the certainty they are requesting.** **Stakeholders: PAs, project developers** **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: The coordinating entity should not conduct solicitations as recommended in bullet point 3. In some instances, PAs may be competing for resources. The recommendation that a centralized entity conduct solicitations on behalf of PAs raises concerns on how the central entity would impact the competitiveness of solicitations, and CleanPowerSF, like other PAs, has a unique process and contracting needs.** **Additionally, a centralized entity may not be in the best position to engage with community sponsors across the state. The community solar program is highly localized and CCAs have spent time developing relationships and building trust with potential community solar sponsors. A community-based organization may be distrustful of a large, centralized entity they are not familiar with and the entity may not have as deep of an understanding of PA-territory specific factors that need to be considered. CleanPowerSF did not find that awareness of the opportunity was the largest barrier to community sponsor participation. Instead, other barriers, such as upfront sponsor responsibilities, costs sponsors must incur years before receiving a discount, and compensation should be evaluated.** **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:** **Stakeholders: PAs, program participants, residents in California Indian Lands** **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.	Reject	**PA Response: CleanPowerSF is partially auto-enrolling its DAC-GT program but supports having the option to maintain some program capacity for proactive enrollment given potential co-marketing opportunities. CleanPowerSF plans to use these programs to inform customers of other clean energy and discount programs and to encourage broader participation in program like CARE and FERA. Additionally, CCAs do not disconnect customers and may have differing collections policies, so the same metrics cannot be used to determine a uniform auto-enrollment criteria.** **Many, if not all PAs will have launched their DAC-GT programs by the time this recommendation could be implemented. Customers who proactively enrolled should not be removed from the program.** **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: CSGT programs have not been in operation long enough to make an informed decision. It is unclear whether this may be perceived as a participation barrier by developers and/or project sponsors.** **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.	Other	**PA Response: Summary bid metrics can be tracked and made available, however, specific bid details are confidential and will not be made available.** **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: It is unclear how some of the metrics, which may be burdensome to track, will address the barrier identified. PAs are likely able to share marketing materials, but may not be tracking every touch point with a potential sponsor.** **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	Other	**PA Response: This data is already provided to the CPUC as part of the annual budget filing. Price data for bids that were not selected is market sensitive and developers may not be open to sharing that data.** **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.	Reject	**PA Response: Program attrition may occur for a variety of reasons that are not captured in a program attrition rate. This appears to be a potentially burdensome reporting requirement with unclear benefits.** **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.	Other	**PA Response: This data is included in the Annual Budget Advice Letters and Quarterly/Semi-Annual reports provided to the CPUC.** **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: This data is already collected as part of the Semi-Annual reporting process. Tracking other programs may not be valuable as program offerings differ across PA territories.** **Stakeholders:** **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: CleanPowerSF has not yet engaged with a workforce development partner for these programs and needs to further evaluate how collection of this data may create a reporting burden relative to the benefits it may provide. CleanPowerSF's solicitation materials include clear workforce development requirements in line with program requirements.** **Stakeholders:** **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: CleanPowerSF rejects the proposal that another LSE serve as the centralized entity. Data collection would force PAs to provide market sensitive and confidential information that should not be shared among market participants. PAs may be competing directly with the designated LSE to acquire the same projects and this proposal would give the central LSE an unfair competitive advantage.** **Stakeholders:** **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: It is too early in the program to establish development targets if there is an incomplete understanding of how much potential available eligible capacity there is within each PA territory and whether developers are interested in bidding into these programs.** **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: Before a minimum number of bids is set, identified barriers to RFO participation should be addressed. It is too early in the program to establish minimums if there is an incomplete understanding of potential eligible project landscape. Further, what is the purpose of this recommendation? if a PA receives attractive bids but does not meet the minimum number of bids, would the PA be forced to reject the viable projects and not implement the program?** **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?	Other	**PA Response: Must consider how this will interact with other program elements such as auto-enrollment, which may result in lower customer awareness, before setting a target level to measure success against. CleanPowerSF recommends addressing this question in the Application for Review process.** **Stakeholders:** **Timeline:**
19	77		**2.2D**: CPUC to clarify: What percentage of awareness is important for the program?	Other	**PA Response: Must consider how will this proposed metric interacts with overarching DAC-GT and CSGT program goals and other recommendations proposed herein. Auto-enrollment and reduced marketing budgets may impact customer awareness levels. CleanPowerSF recommends addressing this question in the Application for Review process.** **Stakeholders:** **Timeline:**

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20	77		**2.2E**: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Reject	**PA Response: PAs are most familiar with their service territories and are well positioned to set individual geographic-specific program priorities. Geographic targeting should not impact the ability of eligible customers having access to these programs.** **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)?	Reject	**PA Response: It may be challenging to identify which customers meet demographic criteria using billing and enrollment data. This may be a burdensome data exercise. How will the data be tracked? Need to determine feasibility of this recommendation. The program already identifies the specific segment of customers eligible for the program by clear geographic boundaries and the goal of this program is to reach all of the customers in this segment. It is unclear how this proposal would benefit the program, particularly for PAs using auto-enrollment.** **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: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it is too early to establish enrollment targets that will be used to evaluate program success. More enrollment data across PAs is valuable information that could inform this metric in the future. CleanPowerSF recommends addressing this question 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: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it is too early to establish additional enrollment targets. More enrollment data across PAs is valuable information that could inform this metric in the future. CleanPowerSF recommends addressing this question in the Application for Review process.** **Stakeholders:** **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: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it may be too early to establish targets that will be used to evaluate program success. More baseline data across PAs is valuable information that could inform this metric in the future. CleanPowerSF recommends addressing this question in the 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?	Other	**PA Response: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it may be too early to establish targets that will be used to evaluate program success. More baseline data across PAs is valuable information that could inform this metric in the future. CleanPowerSF recommends addressing this question 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: The programs were established with goals to increase the development and adoption of renewable energy resources by customers in California's DACs. Additional environmental goals beyond renewable development and associated emissions savings must be considered in the context of the wider California electricity landscape and existing program parameters. CleanPowerSF recommends addressing this question 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: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it may be too early to establish targets that will be used to evaluate program success. Furthermore, available programs may vary widely by service territory, al programs should not be evaluated against a common metric. CleanPowerSF recommends addressing this question in the 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?	Other	**PA Response: This initial program evaluation was conducted before many DAC-GT and all CSGT programs were in operation. As such, it may be too early to establish targets that will be used to evaluate program success. Additionally, capacity allocations across PAs vary widely, all programs should not be evaluated against a common 'number of jobs and trainees' figure. CleanPowerSF recommends addressing this question 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: Renewable project generation verification does not need to be conducted on-site, this may result in unnecessary costs to the program. Can use meter data or WREGIS to confirm generation. CleanPowerSF recommends addressing these additional evaluation topics in the 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: CleanPowerSF recommends including program-specific requirements that may be considered bid submission barriers.** **Stakeholders:** **Timeline:**