

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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.	<p>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.</p>	Rejected	<p>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.</p> <p>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.</p> <p>Stakeholders: Timeline:</p>
2			<p>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.</p>	Other	<p>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.</p> <p>CPA is still considering the recommendation to coordinate outreach efforts and sharing contacts with other Program Administrators.</p> <p>Stakeholders: Timeline:</p>

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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. <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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	<p>PA Response:</p> <p>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.</p> <p>Further, neither of the stated rationales offered by the Independent Evaluator for mandating auto-enrollment of participants are substantiated.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Stakeholders: Timeline:</p>
---	----	--	--	----------	---

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
7	74	Because most PAs had not yet launched the CSGT program at the time of the data request we sent to PAs, and because those that had successfully contracted CSGT programs had not yet begun construction, PAs were not able to provide us with specific estimates of the number of job trainees or specific workforce development metrics and goals.	1.5A: The PAs should require that workforce development attestations include hiring and training metrics, goals, and outcomes.	Other	PA Response: 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:

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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	<p>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.</p> <p>Stakeholders: Timeline: Quarterly</p>
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	<p>PA Response: CPA will continue to provide location of generation resources in its quarterly reports.</p> <p>Stakeholders: Timeline: Quarterly</p>
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Other	<p>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.</p> <p>Stakeholders: IOUs Timeline:</p>
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	<p>PA Response: Under review by CPA. CPA has not yet engaged with a workforce development partner.</p> <p>Stakeholders: Community sponsor, workforce development partner. Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Contract counterparties Timeline:</p>
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	<p>PA Response: Recommended for discussion in Application for Review process.</p> <p>Stakeholders: Timeline:</p>

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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:

				CLEAN POWER ALLIANCE (“CPA”)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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 Ap- plication for Review process. Stakeholders: Timeline:
29	78-79	This evaluation was conducted when it was too soon to take on the following evaluation activi- ties.	2.2N: For future evaluations, the following should be prioritized: <ul style="list-style-type: none">On-site verification of solar project performance through methods such as monitoring energy generation;An economic and job impact assessment; andAn assessment of the impacts from the changes in funding sources that will begin during the year 2022.	Accept	PA Response: Recommended for discussion in Ap- plication for Review process. Stakeholders: Timeline:
30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solicita- tions; this group was much smaller than expected, with just a quarter of survey respondents re- porting 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 Ap- plication for Review process. Stakeholders: Timeline:

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

Study Title:

Program:

Author:

Calmac ID:

ED WO:

Link to Report:

Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs

Disadvantaged Communities Green Tariff and Community Solar Green Tariff

Evergreen Economics and Brightline

TBD

TBD

TBD

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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.
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:
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:

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
4	72-73	<p>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.</p> <ul style="list-style-type: none">○ Solicitation Process and Outreach○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	<p>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.</p> <p>This coordinating organization should:</p> <ul style="list-style-type: none">○ 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	<p>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.</p> <p>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.</p> <p>Stakeholders: Timeline:</p>
5	74	<p>Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.</p>	<p>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.</p>	Accept	<p>PA Response:</p> <p>Stakeholders: PAs, program participants, residents in California Indian Lands Timeline:</p>

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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	<p>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.</p> <p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>
8	75	<p>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.</p> <p>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.</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Other	<p>PA Response: Summary bid metrics can be tracked and made available, however, specific bid details are confidential and will not be made available.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
10	75	<p>C4. Results from program in both costs and benefits: number of MW installed/costs.</p> <p>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.</p> <p>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.</p>	2.1C: Investigate possibility of getting cost/MW installed from solar developers	Other	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>PA Response: This data is included in the Annual Budget Advice Letters and Quarterly/Semi-Annual reports provided to the CPUC.</p> <p>Stakeholders: Timeline:</p>
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Other	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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:

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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:

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	<p>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.</p> <p>Stakeholders: Timeline:</p>
27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	<p>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.</p> <p>Stakeholders: Timeline:</p>

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

Study Title:

Program:

Author:

Calmac ID:

ED WO:

Link to Report:

Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs

Disadvantaged Communities Green Tariff and Community Solar Green Tariff

Evergreen Economics and Brightline

TBD

TBD

TBD

				EAST BAY COMMUNITY ENERGY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indi- cate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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: EBCE is not supportive of transferring responsibilities to a centralized organization, when the purpose of DAC-GT/CSGT programs is to deploy local, renewable development Stakeholders: Contracted third party 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: EBCE supports coordination among each other to develop more robust contact lists of developers with consideration that this will take greater time to coordinate with other PAs and potentially constrain PAs to exceed budget cost caps. 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).	Accepted	PA Response: EBCE agrees that allowing more time for development of the siting and interconnection processes could increase the number of bids. Stakeholders: Timeline:
4	72-73	<p>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.</p> <ul style="list-style-type: none">○ Solicitation Process and Outreach○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	<p>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.</p> <p>This coordinating organization should:</p> <ul style="list-style-type: none">○ 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: EBCE does not support centralizing information, as it directly conflicts with the intent of the programs – local, community-driven projects. PAs have existing relationship with potential community sponsors that a centralized organization would not have. It defeats the purpose of the program if a statewide centralized entity were to engage with a small, local, community-based sponsor potentially hindering timelines. Stakeholders: Timeline:

				EAST BAY COMMUNITY ENERGY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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: EBCE supports 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.	Other	PA Response: EBCE adopted the auto-enrollment method for the DAC-GT program, and we are very supportive of this process as it could eliminate access barriers especially for harder-to-reach customers. EBCE marked this suggestion as other because we would like to support PAs who think it is best to enroll their customers proactively. 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: EBCE has several projects supporting workforce development by partnering with workforce dev organizations in its contracts. EBCE leans supportive on including attestations, but it should be noted to the Commission that this will further delay projects as another party is required to participate in the project development phase. Furthermore, EBCE would like more information from workforce development organizations on potential participation and project barriers. 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.	Accepted	PA Response: EBCE is supportive of this metric, but specific bid details may not be available for public view. 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: EBCE would like more information on how this metric could be used to increase engagement with potential sponsors. EBCE is tracking key marketing material, but find it administratively burdensome to track every interaction with a potential sponsor. Stakeholders: 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: Beyond the data that is already shared in the annual budget filing to the Commission, EBCE does not support sharing confidential energy cost information that could violate confidentiality contracts. Stakeholders: Timeline:

				EAST BAY COMMUNITY ENERGY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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: EBCE leans supportive of this metric, but would like clarification on attrition baselines to set. 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.	Accepted	PA Response: This data is provided to the Commission as part of the annual budget filing, quarterly, and semi-annual reports to the Commission. 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.	Accepted	PA Response: Cross-promoted clean energy programs are tracked as part of the semi-annual reporting process. Cross-promotion of the San Joaquin Valley DAC pilot will be useful for EBCE customers in Tracy. 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: EBCE has several projects supporting workforce development by partnering with workforce dev organizations in its contracts. EBCE leans supportive on including data about training programs, but it should be noted to the Commission that this will further delay projects as another party is required to participate in the project development phase. Furthermore, EBCE would like more information from workforce development organizations on potential participation and project barriers. Stakeholders: Workforce dev partners, community sponsors 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: EBCE does not support efforts of another LSE serving as a centralized entity. Stakeholders: contracted third party 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: EBCE does not have an informed opinion at this time. Stakeholders: CPUC 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: EBCE does not have an informed opinion at this time. Stakeholders: CPUC 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: EBCE does not have an informed opinion at this time. Auto-enrollment will affect awareness levels. Stakeholders: CPUC Timeline:

				EAST BAY COMMUNITY ENERGY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
19	77		2.2D: CPUC to clarify: What percentage of awareness is important for the program?	Other	PA Response: EBCE does not have an informed opinion at this time. Auto-enrollment will affect awareness levels. Stakeholders: CPUC 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: EBCE leans not support further geographically prioritizing one community over another, as there are already very targeted eligibility rules. Stakeholders: CPUC 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: EBCE could be supportive of discussing this further but would like to know the Commission's intent to the DAC-GT/CSGT program. Are the program's objectives meant to meet a subsection of customers? 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: EBCE does not have an informed opinion at this time. Stakeholders: CPUC Timeline:
23	78		2.2H: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	PA Response: EBCE does not have an informed opinion at this time because there is not enough available data to determine the current program. 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: EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. Stakeholders: CPUC 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: EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. Stakeholders: Timeline:
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	PA Response: EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. Stakeholders: CPUC Timeline:
27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	PA Response: EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. Stakeholders: CPUC Timeline:

				EAST BAY COMMUNITY ENERGY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	PA Response: EBCE does not have an informed opinion at this time. EBCE is curious how this will be tracked/ measured. Stakeholders: CPUC 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: <ul style="list-style-type: none">On-site verification of solar project performance through methods such as monitoring energy generation;An economic and job impact assessment; andAn assessment of the impacts from the changes in funding sources that will begin during the year 2022.	Rejected	PA Response: On-site verification is unnecessary and meter data or WREGIS data to confirm generation is sufficient. 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.	Accepted	PA Response: EBCE supports the study including limitations on land costs, siting, and interconnection. Stakeholders: Timeline:

				CleanPowerSF	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	<p>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.</p> <p>Stakeholders: Timeline:</p>
29	78-79	This evaluation was conducted when it was too soon to take on the following evaluation activities.	<p>2.2N: For future evaluations, the following should be prioritized:</p> <ul style="list-style-type: none"> 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	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>PA Response: CleanPowerSF recommends including program-specific requirements that may be considered bid submission barriers.</p> <p>Stakeholders: Timeline:</p>

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				Marin Clean Energy (MCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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	<p>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.</p> <p>Stakeholders: Solar Developers Timeline: Ongoing until PPAs for both programs have been executed</p>
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	<p>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.</p> <p>There also is concern about sharing their developer lists with others as this information may be proprietary.</p> <p>Stakeholders: Solar Developers Timeline: Ongoing until PPAs for both programs have been executed</p>
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	<p>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.</p> <p>Stakeholders: Solar Developers Timeline: Ongoing until PPAs for both programs have been executed</p>

				Marin Clean Energy (MCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
4	72-73	<p>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.</p> <ul style="list-style-type: none"> ○ Solicitation Process and Outreach ○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors 	<p>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.</p> <p>This coordinating organization should:</p> <ul style="list-style-type: none"> ○ 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	<p>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.</p> <p>Stakeholders: Community Sponsor candidates, Solar Developers Timeline: Ongoing until PPAs for both programs have been executed</p>
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.	<p>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.</p>	Accepted	<p>PA Response:</p> <p>Stakeholders: Program Participants Timeline: Ongoing</p>
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.	<p>1.2A: CPUC: Consider using auto-enrollment for all PAs going forward for the DAC-GT program.</p>	Other	<p>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.</p> <p>Stakeholders: N/A Timeline: Ongoing</p>
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.	<p>1.5A: The PAs should require that workforce development attestations include hiring and training metrics, goals, and outcomes.</p>	Accepted with Caveats	<p>PA Response: The requirements for these metrics would need to be built into the contract with the developer.</p> <p>Stakeholders: Community Sponsor candidates, Solar Developers Timeline:</p>
8	75	<p>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.</p> <p>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.</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Rejected	<p>PA Response: The relevant information is outlined in the RFO document. This appears to be a potentially burdensome reporting requirement with unclear benefits.</p> <p>Stakeholders: N/A Timeline:</p>

				Marin Clean Energy (MCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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:

				Marin Clean Energy (MCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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:

				Marin Clean Energy (MCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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: <ul style="list-style-type: none">On-site verification of solar project performance through methods such as monitoring energy generation;An economic and job impact assessment; andAn 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:

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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:

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
4	72-73	<p>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.</p> <ul style="list-style-type: none">○ Solicitation Process and Outreach○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors	<p>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.</p> <p>This coordinating organization should:</p> <ul style="list-style-type: none">○ 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	<p>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 recommendations 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.</p> <p>Stakeholders: Timeline:</p>
5	74	<p>Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.</p>	<p>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.</p>	Accept	<p>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.</p> <p>Stakeholders: CPUC Timeline:</p>

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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:

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
10	75	<p>C4. Results from program in both costs and benefits: number of MW installed/costs.</p> <p>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.</p> <p>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.</p>	2.1C: Investigate possibility of getting cost/MW installed from solar developers	Reject	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Timeline:</p>
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	<p>PA Response: PCE will continue to report information related to the location of projects in quarterly and semi-annual reports.</p> <p>Stakeholders: Timeline:</p>
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Other	<p>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.</p> <p>Stakeholders: IOUs Timeline:</p>
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	<p>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.</p> <p>Stakeholders: Community sponsor, workforce development partner, CSGT project developer Timeline:</p>

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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:

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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:

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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: <ul style="list-style-type: none">On-site verification of solar project performance through methods such as monitoring energy generation;An economic and job impact assessment; andAn 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:

				PENINSULA CLEAN ENERGY AUTHORITY	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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.	2.20: 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:

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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.	<p>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.</p>	Other	<p>PA Response:</p> <p>PG&E recommends the commission weigh the pros and cons of such a coordinator, and requests to be exempted from the administrative effort and cost of creating such an organization as it is nearing fully procured status. It is important for limited procurement resources to be used to greatest effect toward meeting both the state’s reliability, carbon reduction and equity goals.</p> <p>While PG&E believes centralization can provide benefits and streamline processes, PG&E is concerned that the recommendation for centralization is based on extremely low response rates from solar developers (e.g., ~1% of PG&E contacts). This information may not represent the population of solar developers and may not be adequate to base recommendations on process/program changes, namely centralizing solar developer outreach/solicitation. If there is centralization, the PAs should have an option to participate in the centralized solicitation process. There remain open questions to be resolved prior to centralizing the process such as: (0) will increased awareness address root causes of developer lack of response? (1) What structure will the centralized solicitation process take? (2) Who will run a solicitation and contract with this entity? And who will be executing contracts with developers? (3) Who will be negotiating terms and conditions? (4) What additional costs/resources would be required to initiate this process? (5) What cost recovery mechanism would be used, especially light in light of LSEs that have partially or fully met their procurement obligation?</p> <p>Additionally, PG&E suggests the benefits of this coordinator be reviewed in comparison to the value program implementors can provide on their own given the additional costs and complexities associated with pursuing this as an option.</p> <p>PG&E notes that solar developers, through their industry organization did note that they “do not believe the [CS-GT program] would lead to any developer-led projects,” as summarized in D.18-06-027. It is possible that the primary barrier developers face is not awareness or understanding, but instead that the lack thereof stems from a focus on more promising opportunities.</p> <p>Stakeholders:</p> <p>IOUs, Solar Developers, CSGT Community Sponsors, CCAs</p> <p>Timeline:</p> <p>Likely aligned with the Application for Review.</p>

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
2		<ul style="list-style-type: none">• Siting and land costs: We heard from solar developers that land costs present a barrier to proposing projects in the DACs and within the 5-mile surrounding boundaries of the DACs.	1.1B: PAs should invest time and resources into further developing their contact lists for potential solar developers. They could also coordinate efforts and share contacts to maximize their reach.	Other	PA Response: Same as above. Stakeholders: Same as above Timeline: Same as above
3			1.1C: The PAs should conduct solicitations for solar resources on a schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers).	Other	PA Response: Same as above. Stakeholders: Same as above Timeline: Same as above
4	72-73	With multiple PAs taking on similar activities, our evaluation identified key opportunities to streamline and combine efforts with the main focus on solar developer- and community-sponsored outreach and the solicitation process. Evergreen identified two areas where the program may benefit from a centralized coordinator taking on certain roles that are currently performed by each individual PA. <ul style="list-style-type: none">○ 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: <ul style="list-style-type: none">○ Centralize marketing and outreach to inform solar developers of bid opportunities across the PAs to increase awareness of and response to RFOs.○ Invest time and resources into engaging with the solar developer market to increase awareness of the programs and expand developer contact lists.○ Conduct solicitations for solar resources on a predictable schedule that allows time for the development of the siting and interconnection processes (such as a minimum of six to eight months as suggested by two interviewed solar developers).○ Inform and engage with potential community sponsors about CSGT bid opportunities.	Other	PA Response: Same as above. Stakeholders: Same as above Timeline: Same as above
5	74	Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.	1.4A: CPUC: We recommend that similar to DAC-SASH (another program that focuses on DAC customers in single-family homes), the DAC-GT and CSGT programs should expand such that residents in California Indian Lands (i.e., lands within the limits of an Indian reservation and under the jurisdiction of the US government) are eligible for program offerings. This places the program in alignment with Decision 20-12-003, which expanded DAC-SASH in the same way, to align that program with the same underlying statute.	Other	PA Response: PG&E does not oppose this alignment, and notes the importance of leveraging learnings and processes from other programs that target tribal customers, as it can be challenging to determine eligibility. Stakeholders: CCAs, IOUs, CSGT community sponsors, solar developers, tribal leaders, customers Timeline: Likely aligned with Application for Review

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
6	71	Auto-enrollment allows money spent on marketing and outreach to instead become available to pay for the customer bill discount and allows for targeting of customers who are at higher risk of disconnection or who have higher bills. Auto-enrollment also allows a way around participation barriers that may make it harder for some customers to learn about the programs.	1.2A: CPUC: Consider using auto-enrollment for all PAs going forward for the DAC-GT program.	Accept (With modification)	<p>PA Response: PG&E expects to propose auto-enrollment as a means of supporting project launch for CS-GT programs and as a means of supporting full program subscription for CS-GT and DAC-GT. PG&E notes that five CCAs, in resolution 5124, are provided flexibility to use auto enrollment that is consistent with the spirit of Decision 20-07-008.</p> <p>Stakeholders: CSGT Community Sponsors, IOUs, CCAs, CSGT developers</p> <p>Timeline: Aligned with Application for Review</p>
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	<p>PA Response: PG&E is generally supportive of greater clarity on workforce-related metrics and goals for these programs before requesting additional commitments from project developers.</p> <p>Many recommendations from the evaluation are geared towards improving the responses to RFOs, and additional reporting and tracking requirements adds complexity to the already complicated RFO process and may slow progress towards the desired outcome of procuring resources for these programs.</p> <p>Should the commission take this recommendation, the models and best practices from other programs that have focused on workforce issues would be critical. This data is generally very difficult to gather and validate.</p> <p>Stakeholders: CPUC, IOUs, Job Trainees, Solar developers, CSGT sponsors</p> <p>Timeline: Aligned with PAs procurement plans</p>
8	75	<p>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.</p> <p>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.</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Reject	<p>PA Response: This information is generally considered market-sensitive.</p> <p>Stakeholders: IOUs, solar developers</p> <p>Timeline: N/A</p>

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

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Other	<p>PA Response:</p> <p>PG&E is generally supportive of tracking program participation in ESA or SJV pilot programs but also realizes there would be some level of additional program management and analysis to get to this information. If this were a valuable element to include, do so with understanding of the cost-benefit relationship for doing so on a regular cadence.</p> <p>Stakeholders: IOUs, SJV program stakeholders, customers</p> <p>Timeline: Likely aligned to the subsequent evaluation</p>
14	76	<p>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.</p>	<p>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.</p>	Other	<p>PA Response:</p> <p>Same comment as item 7.</p> <p>Stakeholders:</p> <p>Same comment as item 7.</p> <p>Timeline:</p> <p>Same comment as item 7.</p>
15	77	<p>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).</p>	<p>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.</p>		<p>PA Response:</p> <p>Regarding a centralized data collection effort, PG&E also recommends the CPUC weigh the pros and cons of such a coordinator. PG&E suggests including for consideration, leveraging existing reporting methods such as the DG stats web portal to submit DAC data on a quarterly basis in lieu of the quarterly filing of the DAC progress report to avoid redundancy and eliminate creation of a new data platform specific to this program. This would incorporate data into an existing, centralized location and create consistency across the program administrators. The intent of this seems to be a consolidation of progress in consistent ways across the state; DG stats is a strong, existing location for data (contingent upon this replacing a quarterly filing); provides data in a more useful way in aggregate across all administrators.</p> <p>Stakeholders:</p> <p>CCAs, IOUs, CSGT community sponsors</p> <p>Timeline: Changes to reporting requirements are likely tied to the Application for Review timing as these are currently ordered in a commission decision.</p>

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

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
22	78		2.2G: CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	PA Response: Same as above. In addition, PG&E notes that this metric may not be applicable across all PAs of vastly different sizes and states of program maturity. Stakeholders: Same as above. Timeline: Same as above.
23	78		2.2H: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.
24	78		2.2I: CPUC to clarify: What percentage of customers would the program expect to see who feel that they are contributing to renewable energy?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.
25	78		2.2J: CPUC to clarify: What percentage of customers would the program like to achieve in terms of customers feeling like the program reduces GHG emissions?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.
27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.

				PACIFIC GAS & ELECTRIC (PG&E)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Re- jected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	PA Response: Same as above. Stakeholders: Same as above. Timeline: Same as above.
29	78-79	This evaluation was conducted when it was too soon to take on the following evaluation activities.	2.2N: For future evaluations, the following should be prioritized: <ul style="list-style-type: none"> On-site verification of solar project performance through methods such as monitoring energy generation; An economic and job impact assessment; and An assessment of the impacts from the changes in funding sources that will begin during the year 2022. 	Other	PA Response: At the time of the next program evaluation, these items may or may not be beneficial. PG&E notes that to the extent that additional evaluation scope would require additional monitoring, tracking or reporting as part of regular program administration, these will increase the administrative cost of the program and may make resource procurement even more difficult (for example if developers must install additional equipment or do additional reporting). PG&E also suggests with this recommendation for additional metrics to track that there be a review of program cost effectiveness using a standard cost effectiveness method. Stakeholders: Project developers, community sponsors, IOUs, CCAs, job trainees, Timeline: Aligned with future triennial evaluation.
30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solicitations; this group was much smaller than expected, with just a quarter of survey respondents reporting having reviewed at least one program RFO.	2.2O: CPUC: We recommend conducting a study of the broader market of solar developers focused on sharing the range of possible RFO features with respondents to assess what the major challenge points are that limit RFO participation such as land costs, siting, and inter-connection barriers.	Other	PA Response: PG&E generally supports learning from other community solar models, especially those that reduce complexity and provide additional flexibility Stakeholders: Solar project developers, community sponsors, IOUs, CCAs Timeline: N/A

SCE Response to Recommendations (RTR) in Process Evaluation

Study Title: Process Evaluation of the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs
Program: Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT)
Author: Evergreen Economics
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				SOUTHERN CALIFORNIA EDISON COMPANY (SCE)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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 <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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.	Accepted	PA Response: Clarity is requested on who covers the cost for this activity. Stakeholders: Unknown Timeline: Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation.
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.	Rejected	PA Response: SCE is not comfortable sharing contact lists due to confidentiality concerns. Stakeholders: N/A Timeline: N/A
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: SCE runs two RFOs per year and has launched those RFOs at the same time since these programs started. As part of the submission requirements for developers on this and all other RFO's, SCE conducts prerequisites to determine project viability including site control and either an interconnection study or executed Interconnection Agreement. SCE proposes that solicitations be run annually, rather than bi-annually and is open to extending the offer submission window but is not open to easing the project viability requirements needed to select viable offers. Stakeholders: Developers Timeline: SCE will need 6 months from application approval to update RFO materials to incorporate changes from application and request CPUC approval of launch documents.

4	72-73	<p>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.</p> <ul style="list-style-type: none"> ○ Solicitation Process and Outreach ○ Provide More Support and Coordinate Efforts to Engage Potential Community Sponsors 	<p>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.</p> <p>This coordinating organization should:</p> <ul style="list-style-type: none"> ○ 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	<p>PA Response: If this recommendation is specific to marketing and outreach then SCE accepts the recommendation and would need clarity on who covers the cost for this activity. If the recommendation is related to centralizing RFO solicitations, then SCE rejects a centralized entity to perform this work.</p> <p>Stakeholders: Unknown Timeline: If this recommendation is specific to marketing and outreach, then the timeline is contingent upon approval of the application and subsequent approval of corresponding program budget advice letter. If the recommendation is related to centralizing RFO solicitations, then the timeline is not applicable.</p>
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	<p>PA Response: SCE supports residents in California Indian Lands being eligible for this program</p> <p>Stakeholders: N/A Timeline: Contingent approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, SCE will likely need several months after this to implement required billing system changes to track Indian lands as well as system changes to the enrollment tool.</p>
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.	Accepted	<p>PA Response: SCE supports using auto-enrollment going forward for SCE’s DAC-GT program.</p> <p>Stakeholders: N/A Timeline: Contingent approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, the vendor will likely need several months after this to implement due to required system changes to the enrollment tool.</p>
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	<p>PA Response: Although SCE is supportive of this recommendation, we do have an ongoing concern that metrics may increase costs and impact the developer's decision to participate in the solicitations.</p> <p>Stakeholders: Developers Timeline: Contingent upon approval of the application.</p>
8	75	<p>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.</p> <p>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</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Rejected	<p>PA Response: SCE does not support this recommendation since the information is confidential and already provided to Energy Division via the confidential Independent Evaluator report.</p> <p>Stakeholders: N/A Timeline: N/A</p>

9	75	<p>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.</p>	<p>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, any type of outreach done prior to event.</p>	Accepted	<p>PA Response: SCE can provide this information if requested</p> <p>Stakeholders: N/A Timeline: Contingent upon approval of the application.</p>
10	75	<p>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.</p> <p>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 nonparticipant cost is partially balanced by the nonparticipant experiencing the benefit of a cleaner grid.</p>	<p>2.1C: Investigate possibility of getting cost/MW installed from solar developers</p>	Rejected	<p>PA Response: SCE would be unable to provide this information because the costs of installed MWs would come from developers and could vary greatly from project to project. The developers do not share this information with SCE and likely would not want to share this with SCE, since that information is proprietary.</p> <p>Stakeholders: Developers Timeline: N/A</p>
11	76	<p>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.</p>	<p>2.1D: Track rates of attrition for program enrollees.</p>	Rejected	<p>PA Response: Data has shown little or no attrition. SCE does not support a proposal to monitor attrition rate since the assumption is that most customers would want the 20% bill discount. It is SCE's belief that attrition would likely only be a result of customers closing their account. This would be difficult to track, is not informative, and would be hard to determine the reason for dropping out of the program.</p> <p>Stakeholders: N/A Timeline: N/A</p>
12	76	<p>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.</p>	<p>2.1E: Report on location of DAC-GT and CSGT generation. This is not done by all PAs at this time.</p>	Other	<p>PA Response: SCE already reports out the customer count by census tract, along with the census tract that the project is in for each program. If needed, SCE can separate the reporting out by Project as opposed to program. However, customer-specific information is confidential and cannot be shared.</p> <p>Stakeholders: N/A Timeline: Already providing this information.</p>
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Rejected	<p>PA Response:</p> <p>Response to 2.1F - SCE supports having accurate data, but SCE questions the usefulness of this data as it relates to any modifications to the DAC-GT/CSGT programs. In addition, SCE requests clarification of which clean energy programs that would be tracked, since DAC GT/CSGT customers are not eligible for NEM and other green energy programs. Program participation data would have to be limited to what is available in SCE system(s). For example, we may have minimal (if any) program participation information for customers on a master meter or served by a CCA. If the data is regarding SJV customers, SCE already provides this information at the census tract level in the quarterly progress report. Customer-specific information is confidential and cannot be shared.</p> <p>Response to 2.1G - SCE supports having accurate data, but SCE questions the usefulness of this data as it relates to any modifications to the DAC-GT/CSGT programs. In addition, program participation data would have to be limited to what is available in SCE system(s). For example, we may have minimal (if any) program participation information for customers on a master meter or served by a CCA. If the data is regarding SJV customers, SCE already provides this information at the census tract level in the quarterly progress report. Customer-specific information is confidential and cannot be shared.</p> <p>Stakeholders: N/A Timeline: N/A</p>

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.	Accepted	<p>PA Response: This information is provided by Developers upon SCE's request. As such, SCE agrees with the recommendation to provide this information as it is provided by Developer(s) no more than once per year.</p> <p>Stakeholders: Developers</p> <p>Timeline: Developers already providing this information.</p>
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.	Other	<p>PA Response: SCE recommends that we leverage DG Stats to submit DAC data on a quarterly basis and also eliminate the quarterly filing of the DAC progress report. Instead, incorporate into the data that would be submitted to DG Stats.</p> <p>Stakeholders: Energy Solutions (vendor for DG Stats)</p> <p>Timeline: Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation. Upon approval of the application and budget advice letter, the vendor will likely need several months after this to implement the reporting requirements.</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
19	77		2.2D: CPUC to clarify: What percentage of awareness is important for the program?	Other	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
20	77		2.2E: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Other	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
22	78		2.2G: CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Other	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
23	78		2.2H: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
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	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	<p>PA Response: N/A</p> <p>Stakeholders: N/A</p> <p>Timeline: N/A</p>

27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	PA Response: N/A Stakeholders: N/A Timeline: N/A
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	PA Response: N/A Stakeholders: N/A Timeline: N/A
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: <ul style="list-style-type: none"> • 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. 	Rejected	PA Response: The benefits of the recommendation are unclear. There are already performance obligations by developers under the contracts by SCE. Additionally, changes funding source from GHG to Public Purpose funds for volumetric costs such as the 20% discount should not have any impact on the customers as the DAC decision already contemplates the use of Public Purpose funds should GHG funding run out. Stakeholders: Developers Timeline: N/A
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: Clarity needed on who covers cost for this activity. SCE recommends this activity not be a standalone activity but be included in the next program evaluation which occurs every three years. Stakeholders: Independent Evaluator Timeline: Contingent upon approval of the application and subsequent approval of corresponding program budget advice letter to implement the recommendation.

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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.	<p>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.</p>	Reject	<p>SDG&E Response:</p> <p>This recommendation would not necessarily change the outcomes. SDG&E’s main challenges with the programs are that land costs are expensive in the county, including within its DACs, which are urban and coastal, as correctly noted in the evaluation. The contracts for these programs must be procured from within DACs. SDG&E also has smaller numbers of DACs compared to PG&E and SCE. Therefore, SDG&E does not see the issue as needing to better promote or market its RFP opportunities since that does not solve land availability, locations, or costs.</p> <p>Stakeholders: N/A Timeline: N/A</p>
2			<p>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.</p>	Reject	<p>SDG&E Response:</p> <p>SDG&E believes that it should be well known among developers that California IOUs have the DAC-GT and CSGT programs available to them. Additionally, SDG&E posts publicly on its website when it runs DAC-GT and CSGT solicitations, as well as distributes the solicitation announcement to an excess of 2,600 email recipients, including mostly developers, to encourage interest in bidding into the program. SDG&E continually updates its contacts list and encourages all interested developers to reach out to be added to this distribution list and distribution of all RPS notices posted by SDG&E for development procurement opportunities.</p> <p>Stakeholders: N/A Timeline: N/A</p>

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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).	Reject	SDG&E Response: SDG&E believes that siting and interconnection of projects should be well-established prior to the project entering into the competitive solicitation process. SDG&E's DAC-GT and CSGT solicitations cycles to procure these projects are held in approximately the same schedule each year, so the general schedule developers should be working with can easily anticipate the siting and interconnection timing prior to bidding the proposed project into a DAC-GT and CSGT solicitation process. Additionally, it seems unclear to SDG&E how projects could bid a project into these competitive solicitations without knowing siting and interconnection costs and timelines, so SDG&E fails to see how this could improve bidder success. Stakeholders: N/A Timeline: N/A
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. <ul style="list-style-type: none">○ 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: <ul style="list-style-type: none">○ 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	SDG&E Response: This recommendation would seem to potentially increase effort, complexities, and costs (to cover the coordination or centralization) and does not address SDG&E's primary challenges. If the recommendation is fully understood correctly, SDG&E would also be concerned with any coordination efforts done in solicitations since such solicitations must limit who sees such bids, maintain confidentiality of bids and competitive fairness. Firewalls and other mechanisms would need to be in place to ensure adequate controls, which would add complexities. Stakeholders: N/A Timeline: N/A
5	74	Expanding DAC-GT and CSGT to all federally recognized tribes can help to ensure that the programs better meet the intent of AB 327.	1.4A: CPUC: We recommend that similar to DAC-SASH (another program that focuses on DAC customers in single-family homes), the DAC-GT and CSGT programs should expand such that residents in California Indian Lands (i.e., lands within the limits of an Indian reservation and under the jurisdiction of the US government) are eligible for program offerings. This places the program in alignment with Decision 20-12-003, which expanded DAC-SASH in the same way, to align that program with the same underlying statute.	Other	PA Response: SDG&E does not object to this recommendation but is unsure whether this would have any impact in SDG&E's territory. Stakeholders: N/A Timeline: N/A
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	SDG&E's Response: SDG&E objects that this be mandated to all IOUs as it would increase IT and other administration costs and is not guaranteed to be of any benefit. SDG&E's challenges are not in enrolling customers, but in it receiving any bids into the RFPS. Stakeholders: N/A Timeline: N/A
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.	Accept	SDG&E's Response: Supports. SDG&E found this recommendation to be valuable and actionable. Stakeholders: PAs Timeline: TBD

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
8	75	<p>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.</p> <p>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.</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Accept	<p>SDG&E's Response: Supports. SDG&E found this recommendation to be valuable and actionable.</p> <p>Stakeholders: PAs Timeline: TBD</p>
9	75	<p>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.</p>	<p>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.</p>	Reject	<p>SDG&E's Response: The Community Solar model is that the solar developers are to market their own projects once they have been bid into the RFPs and contracted under PPAs with the IOU at prices that are under the CSGT bid cap. As a policy matter, SDG&E does not endorse any developers or do outreach on their behalf to sponsors. SDG&E cannot know whether any solar developer who bids and contracts is viable, and capable of building a system and interconnecting to the grid, nor does SDG&E do that analysis to determine such. SDG&E cannot risk its relationships with community-based organizations to assist for-profit solar companies that SDG&E has no way to assess, nor is that an appropriate role for the utility.</p> <p>Stakeholders: N/A Timeline: N/A</p>
10	75	<p>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.</p> <p>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.</p>	<p>2.1C: Investigate possibility of getting cost/MW installed from solar developers</p>	Accept	<p>SDG&E's Response: Supports. SDG&E does not object to this; it would be reasonable to undertake and would add value to the evaluation process in the future.</p> <p>Stakeholders: Solar Developers and PAs Timeline: TBD</p>
11	76	<p>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.</p>	<p>2.1D: Track rates of attrition for program enrollees.</p>	Accept	<p>SDG&E Response: Supports. SDG&E does not object to this, it would be reasonable to undertake and would add value to the evaluation process in the future.</p> <p>Stakeholders: PAs Timeline: TBD</p>

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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	SDG&E's Response: SDG&E is neutral on this as it may not apply to SDG&E under the current constraints of the programs. At a minimum, SDG&E is unclear as to how the recommendation of reporting on the location of generation should be done, when SDG&E has no generation for CSGT and DAC-GT. Also, this recommendation is made to tie to the numbers of customers enrolled as a metric, which SDG&E has none. Stakeholders: N/A Timeline: N/A
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.	Reject	SDG&E's Response: SDG&E does not currently capture program data for the majority of its clean energy programs. Additionally, SDG&E is not the Program Administrator for some clean energy programs in its service territory, such as SGIP, DAC-SASH, SOMAH, CSI Thermal, etc., and would not have customer-level data. This requirement could impose a significant IT investment. Given that SDG&E does not have any customers enrolled and is unlikely to under current circumstances, investing in this upgrade is not an effective use of funds or resources. Stakeholders: N/A Timeline: N/A
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	SDG&E's Response: SDG&E would be procuring energy through RFPs for these programs and would need to include questions about this in the RFP itself. However, what a developer may report at the RFP stage may not be what the actual result is. So, without further investigation and/or reporting done to SDG&E by such a developer, for projects underway, SDG&E may not have insight into actual job training done by the solar developers. If this became a requirement, SDG&E would need to increase its administration costs to develop a system to be able to verify the work training that is being done and to have insight into this area for activity today it does not monitor. It would also require an increased budget. Stakeholders: N/A Timeline: N/A
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	SDG&E's Response: There are multiple programs operated by each IOU, and across the state, and the CPUC and its evaluators regularly gather data from multiple sources. These programs do not have larger numbers of administrators than many other programs. The argument to add significant costs and a centralized coordinator is unsupported by the evidence. Stakeholders: N/A Timeline: N/A

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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?	Neutral	PA Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
17	77		2.2B: CPUC to clarify: What is the minimum acceptable number of conforming bids, and how many conforming bids would be ideal?	Neutral	PA Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
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?	Neutral	PA Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
19	77		2.2D: CPUC to clarify: What percentage of awareness is important for the program?	Neutral	PA Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
20	77		2.2E: CPUC to clarify: What priority should different eligible geographies have? Is further geographic targeting of interest to the program?	Neutral	PA Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
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	SDG&E Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. That being said, SDG&E might not track certain data associated with specific customer segments. Depending on the segment, SDG&E might lack the ability to target those segments and meet the corresponding goals. SDG&E does track, in this example, if a customer is on CARE/FERA or if the customer has requested materials in a language other than English. Stakeholders: N/A Timeline: N/A
22	78		2.2G: CPUC to clarify: What share of eligible customers for CSGT being enrolled would constitute a success?	Reject	SDG&E’s Response: The IOUs cannot control what solar developers bid into the RFPs with variables such as availability and cost of land located in DACs, etc. Therefore, the IOUs should not be held to any goal for enrollment. Stakeholders: N/A Timeline: N/A

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
23	78		2.2H: CPUC to clarify: What additional enrollment targets would the program like to see?	Reject	SDG&E's Response: The IOUs cannot control what solar developers bid into the RFPs with variables such as availability and cost of land located in DACs, etc. Therefore, the IOUs should not be held to any goal for enrollment. Stakeholders: N/A Timeline: N/A
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?	Neutral	SDG&E's Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
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?	Neutral	SDG&E's Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Neutral	SDG&E's Response: N/A this comment is directed at the CPUC and SDG&E has no position at this time. Stakeholders: N/A Timeline: N/A
27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Reject	SDG&E's Response: The IOUs cannot control the number or types of bids into the RFPs, and the corresponding job training that would result. The IOUs could encourage it, but not control it or be held to any metric. Stakeholders: N/A Timeline:
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Reject	SDG&E's Response: The IOUs cannot control the number or types of bids into the RFPs, and the corresponding job training that would result. The IOUs could encourage it, but not control it or be held to any metric. Stakeholders: N/A Timeline: N/A
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: <ul style="list-style-type: none"> 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. 	Support	SDG&E's Response: This is directed to the CPUC. However, SDG&E would support this as an additional compliance measure. Stakeholders: Solar Developers and PAs Timeline: N/A

				SAN DIEGO GAS AND ELECTRIC CO.	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
30	80	Our research focused on a subset of solar developers that reviewed DAC-GT and CSGT solici- tations; this group was much smaller than expected, with just a quarter of survey respondents re- porting having reviewed at least one program RFO.	2.20: 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.	Reject	SDG&E's Response: This is directed to the CPUC. However, SDG&E believes this seems unnecessary to do at ratepayer expense and would be a responsibil- ity of the solar industry groups and only if they should see value in it themselves. Stakeholders: N/A Timeline: N/A

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
Author: Evergreen Economics and Brightline
Calmac ID: TBD
ED WO: TBD
Link to Report: TBD

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
1	70 to 71	<p>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.</p> <p>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.</p> <p>The solar developers who <i>were</i> aware of RFOs reported challenges related to:</p> <ul style="list-style-type: none">• 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	<p>PA Response:</p> <p>SJCE rejects the creation of a centralized organization to engage in additional ME&O efforts. Adding a third-party entity would not only complicate the process for prospective bidders but could also potentially increase costs if the solicitation process is lengthened.</p> <p>SJCE is not opposed to devoting additional ME&O efforts towards interacting with solar developers if (1) the ME&O cap is increased to allow for such efforts without depleting other program funding, and (2) it is shown that lack of adequate outreach is the reason for the low number of responses. Marketing may not be the primary reason why project developers are not bidding. Many projects have small capacities which are in between the typical sizes for rooftop installations and larger scale projects. For example, SJCE's 1.7MW DAC-GT allotment was very unlikely to be served by wind at all, so solar became the main viable resource option for renewable electricity. More review of how project requirements affect bidding could be useful to understand whether it is market awareness or market misalignment that are causing issues.</p> <p>Stakeholders: Timeline:</p>
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	<p>PA Response:</p> <p>Related to response in 1.1A</p> <p>Stakeholders: Timeline:</p>

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
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: SJCE would support a minimum solicitation period for RFOs that accommodates the development of siting and interconnection processes to increase participation of developers; however, SJCE believes that all PAs should not be required to issue RFOs at the same time each year. 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. <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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: Related to response in 1.1A. SJCE does not administer CSGT. 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: SJCE would be supportive of extending these programs to residents in California Indian Lands. Stakeholders: 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.	Accepted	PA Response: While SJCE has decided to pursue auto-enrollment in 2022 in order to ensure program spots are filled (and therefore maximize the number of customers receiving discounts), SJCE considers the outreach and elective enrollment process at launch to be extremely important in reaching underserved and hard-to-reach communities such as Spanish and Vietnamese speakers. Care should be taken with setting the rules for auto-enrollment to ensure that underserved customers are equitably included. Stakeholders: Customers typically underserved by programs Timeline: June 2022
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	PA Response: SJCE does not administer CSGT. Stakeholders: Timeline:

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
8	75	<p>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.</p> <p>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.</p>	<p>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:</p> <p>2.1A: # of conforming and non-conforming bids differentiated by the # of submitted offers vs. the # of proposed projects in those offers.</p>	Accepted	<p>PA Response:</p> <p>SJCE would be willing to share the number of conforming and non-conforming bids differentiated by the number of submitted offers versus the number of proposed projects in those offers for the next triennial review.</p> <p>Stakeholders: Timeline:</p>
9	75	<p>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.</p>	<p>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.</p>	Accepted	<p>PA Response:</p> <p>SJCE does not administer CSGT.</p> <p>Stakeholders: Timeline:</p>
10	75	<p>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.</p> <p>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.</p>	<p>2.1C: Investigate possibility of getting cost/MW installed from solar developers</p>	Rejected	<p>PA Response:</p> <p>Disclosing cost/MW installed provided in bids would require SJCE to divulge information that constitutes confidential and market sensitive information. Additionally, for executed bids, SJCE provides this information in the power purchase agreements it submits to the CPUC per Resolution E-5124.</p> <p>Stakeholders: Timeline:</p>
11	76	<p>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.</p>	<p>2.1D: Track rates of attrition for program enrollees.</p>	Other	<p>PA Response:</p> <p>Measuring attrition may not provide much insight into whether a customer (regardless of enrollment) knows certain features of the program. Move-outs, switching rates, and CARE/FERA expiration are all common reasons for customer attrition for SJCE. It should not be assumed that customers are weighing these changes against their enrollment in DAC-GT. It may be more useful to measure reasons for attrition across eligibility criteria (e.g. CARE/FERA, location in a DAC) to understand how eligibility criteria over time affect enrollment.</p> <p>Stakeholders: Timeline:</p>
12	76	<p>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.</p>	<p>2.1E: Report on location of DAC-GT and CSGT generation. This is not done by all PAs at this time.</p>	Rejected	<p>PA Response:</p> <p>SJCE already provides this in Quarterly Reports (i.e. number of customers enrolled by DAC tract) and in the Annual Budget Advice Letters.</p> <p>Stakeholders: Timeline:</p>

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
13	76	<p>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.</p> <p>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.</p>	<p>2.1F: Track customer information regarding participation in other cross-promoted clean energy programs and indicating which customers are master metered (for CSGT only).</p> <p>2.1G: Collect program tracking data to map to participants that also participated in Energy Savings Assistance or the San Joaquin Valley DAC Pilot.</p>	Accepted	<p>PA Response:</p> <p>SJCE would be open to share enrollment data for participants receiving Energy Savings Assistance in an SJCE-administered program. However, metrics outside of SJCE's own programs would be best provided by PG&E as this isn't data SJCE readily has access to.</p> <p>Stakeholders: Timeline:</p>
14	76	<p>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.</p>	<p>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.</p>	Other	<p>PA Response:</p> <p>As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting.</p> <p>Stakeholders: Timeline:</p>
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).	<p>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.</p>	Other	<p>PA Response:</p> <p>SJCE is not opposed to centralizing data, however the development of a website specifically for DAC-GT data, which is only submitted quarterly, may not be worth the effort. This development should not come from PAs' existing budgets, nor should any new data reporting rules significantly increase the administrative burden of reporting program data.</p> <p>Stakeholders: Timeline:</p>
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.	<p>2.2A: CPUC to clarify: How much capacity is expected on what timeline?</p>	Other	<p>PA Response:</p> <p>SJCE would support CPUC establishing a general timeline for reaching capacity but not a specific date for doing so as this would not take into consideration the processes of various PAs.</p> <p>Stakeholders: Timeline:</p>
17	77		<p>2.2B: CPUC to clarify: What is the minimum acceptable number of conforming bids, and how many conforming bids would be ideal?</p>	Other	<p>PA Response:</p> <p>SJCE would require more clarification for the use of this metric. It opposes setting a minimum amount of acceptable conforming bids if this would result in penalties to PAs.</p> <p>Stakeholders: Timeline:</p>

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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?	Accepted	PA Response: SJCE would be interested in the CPUC clarifying what constitutes awareness of the program and how levels of awareness would be quantified. Awareness of the benefits of access to renewable energy at a discounted price is integral to the rate of participation; however, there are other factors that drive participation in the DAC-GT program. Stakeholders: Timeline:
19	77		2.2D: CPUC to clarify: What percentage of awareness is important for the program?	Accepted	PA Response: SJCE would be interested in CPUC clarifying what constitutes awareness of the program and how awareness would be measured and identified. 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: As PAs are more equipped to understand the needs of specific geographic areas, SJCE believes it would be inappropriate for CPUC to determine where there should be further geographic targeting. Without proper understanding of various PAs service territories, the CPUC could limit the ability of eligible customers from enrolling by identifying other geographic areas as higher priority. 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)?	Accepted	PA Response: SJCE supports a goal for PAs to tailor its ME&O efforts to reach all factions of DAC service areas but would not be receptive to CPUC setting metrics PAs must reach in their administration of the program. Providing this data may prove to burdensome on PAs. Additionally, SJCE already makes this a goal to reach customers of varying backgrounds and languages when engaging in ME&O efforts for the DAC-GT program. 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: SJCE does not administer CGST. Stakeholders: Timeline:

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
23	78		2.2H: CPUC to clarify: What additional enrollment targets would the program like to see?	Other	PA Response: SJCE is unsure if an imposition of additional enrollment targets would benefit the implementation of the DAC-GT program. This additional requirement may be a hinderance this early in the program. 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: SJCE would require further clarification on how this metric will be tracked/gathered. Stakeholders: Timeline:
u	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: SJCE would require further clarification on how this metric will be tracked/gathered. Stakeholders: Timeline:
26	78		2.2K: CPUC to clarify: What goals would the program like to set for environmental benefits?	Other	PA Response: SJCE would like further clarification on how this metric will be tracked/gathered. Stakeholders: Timeline:
27	78		2.2L: CPUC to clarify: What is the number of leveraged job training programs expected?	Other	PA Response: As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting. Stakeholders: Timeline:
28	78		2.2M: CPUC to clarify: What are the number of local job hires and trainees expected?	Other	PA Response: As only CGST projects require plans from developers to demonstrate implementation of local hiring and job training, SJCE has no response. SJCE does not administer CGST. If this is related to DAC-GT administration, SJCE would be interested in why there is a need for such metrics before accepting. Stakeholders: Timeline:

				San José Clean Energy (DAC-GT Only)	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for re- jection, or indicate that it's under further review.
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: <ul style="list-style-type: none">On-site verification of solar project performance through methods such as monitoring energy generation;An economic and job impact assessment; andAn assessment of the impacts from the changes in funding sources that will begin during the year 2022.	Accepted	PA Response: SJCE is generally supportive of these topics in future evaluations but does not feel on-site verification of solar project performance is required. Energy generation data can be gleaned from meter data or WREGIS data. 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.	Accepted	PA Response: SJCE is supportive of a broader market study of solar developers. Stakeholders: Timeline: