

**RESPONSES TO COMMENTS ON DRAFT PROGRAM GUIDELINES
 LOW-INCOME WEATHERIZATION PROGRAM
 FISCAL YEAR 2017-18 APPROPRIATION PROCUREMENT:
 COMMUNITY SOLAR PILOT PROGRAM**

The California Department of Community Services and Development (CSD) released draft Program Guidelines for the Low-Income Weatherization Program’s (LIWP) Community Solar Pilot Program component on June 25, 2018. A public hearing was held on these draft Guidelines, and public comments were received in writing. The table below summarizes the major written comments received, and CSD’s responses. The final version of the Program Guidelines was released August 1, 2018 and can be viewed, along with copies of the written public comments, at: <http://www.csd.ca.gov/LIWP>

| Commenter | | Comment | CSD Response |
|-----------|---|---|---|
| 1. | The California Housing Partnership Corporation (CHPC) | 1.1 Eligible costs that include “a loan loss reserve” and “subsidies to eligible households” can improve participation, project feasibility, and consumer protection in this pilot program. | Thank you for the comment in support of approach. |
| | | 1.2 The Customer Enrollment and Service Plan requirements detail how participants should benefit from community solar and how they may be protected from unintended consequences of having access to solar energy. We agree that proposals should be “evaluated on the robustness of marketing and outreach and community connections, description of eligibility and enrollment procedures, clarity of contract terms, and explanation of consumer protection and education plans” | Thank you for the comment in support of approach. |
| | | 1.3 The Community Engagement Plan requirements detail engagement strategies that can help ensure projects have a meaningful connection to the local communities they are based in and/or provide benefits to. We agree that proposals should be “evaluated on the robustness of | Thank you for the comment in support of approach. |

| | | | |
|----|-------------------|---|---|
| | | the combination of activities performed or proposed to engage community stakeholders and the evaluation plan” | |
| 2. | GRID Alternatives | 2.1 Eligible costs include “funding a loan loss reserve or other payment guarantee fund to protect against late or non-payments by participants”. GRID cautions against use of funds for financial models that are yet unproven and more difficult to directly track, and recommends robust consumer protections to be included for participating low-income customers if such models are supported through the pilot. Additionally, co-benefit and impact commitments for any such models should be rooted in tangible, near-term projects with clear outcomes for low-income participation and benefit (not an estimated or aggregated number of customers over a long period of time). | Agreed in principle, but since this a pilot CSD is not dictating a particular model, and believes that the scoring matrix will award greater points to proposals that have robust consumer protections and tangible outcomes. |
| | | Eligible entities include Community Development Finance Institutions (must be a non-profit). If CDFI’s are eligible to lead submissions, proposals and impact commitments should be tied to real projects, rather than financial structures or funds that will enable low-income customer participation in future projects. | Agreed. Proposals must specify a project site and create new energy generation offsetting existing electricity grid usage and benefiting multiple property locations. |
| | | 2.2 In Customer Enrollment and Service Plan section, contract terms should also disclose price escalators included for customers, if any. | Agreed. Disclosure of price escalators added to contract disclosure provisions. |
| | | 2.3 For energy cost benefits for low-income participants, CSD should encourage respondents to detail length of time cost benefits will be experienced. | Agreed. Energy cost benefits proposal and scoring requirements have been expanded and standardized in the Notice of Funding |

| | | | |
|--|--|--|--|
| | | | Availability (NOFA) to include a formula with term lengths as a variable. |
| | | 2.4 CSD should generally favor projects that provide benefits for a longer period of time. | Agreed in principle, but since this a pilot CSD is not dictating a particular model, and believes that the scoring matrix in the NOFA will award greater points to proposals that demonstrate longer commitment to benefiting low-income households. |
| | | 2.5 Both “carve out” and “standalone” models are eligible, but proposals will be evaluated on the GHG and other benefits accruing from the portion of the project dedicated to low-income households and California Climate Investments funds awarded. If a carveout is proposed, CSD should require that the carveout is dedicated to low-income customers for the lifetime of the project (at least 20 years), through a signed, up-front commitment from the respondent. This avoids a situation whereby a respondent could revert the capacity back to non-low-income customers after a short period of time. Customers may still move in and out of the project, but the minimum amount of capacity or % of project committed should be maintained for the life of the project. | Agreed in principle, but since this a pilot CSD is not dictating a particular model, and believes that the scoring matrix in the NOFA will award greater points to proposals that demonstrate longer commitment to benefiting low-income households. |
| | | 2.6 In the Customer Enrollment and Service Plan, Respondent should clearly indicate plan for billing, or otherwise transferring benefits to low-income customers, including any necessary changes to utility billing software, and status | Agreed – text added. Text also amended to state required letter from electric Load-Serving Entity should include feasibility of interconnection and |

| | | | |
|----|-----------------|--|---|
| | | <p>/ plan for achieving those changes. Respondents should clearly indicate if they will require low-income customers to participate through an additional bill and their experience and plan for successfully implementing such a model with low-income Customers.</p> | <p>support for enabling relevant aspects.</p> |
| | | <p>2.7 In the scoring criteria, Project Burdens and Co-benefits should be separate evaluation criteria and a higher weighting should be given to Co-benefits, as a standalone.</p> | <p>Scoring criteria and points allocation have been adjusted in the NOFA to give greater weight to co-benefits in the combined category.</p> |
| | | <p>2.8 In the scoring criteria, Community Engagement Plan is also an essential component of a successful project and should receive higher weighting.</p> | <p>Scoring criteria and points allocation have been adjusted in the NOFA to give greater weight to Community Engagement Plan.</p> |
| 3. | Jimmy Rodriguez | <p>3.1 When I applied for solar, with the GRID PROGRAM for the low income, I was told we qualified. However, because we do not own the land where our Mobile Homes are on, we are not able to install the solar system, and that we are excluded to receive the solar system to provide clean energy and savings to residents. There should be some kind of funding for Mobile Home Residents who have owned our homes for a long time and plan to own our homes for many years.</p> | <p>CSD's existing Single-Family Energy Efficiency and Solar Photovoltaics (PV) Program does restrict eligibility for Solar PV installation to single-family owner-occupants. In introducing the Community Solar Pilot Program, CSD hopes the pilot offers the potential to increase access to clean solar power through sharing the production output of an off-site solar system, typically large enough to serve multiple households and other electricity users.</p> |