



July 19, 2018
Ms. Linné K. Stout
Department of Community Services and Development
2389 Gateway Oaks, Suite 100
Sacramento, CA 95833

RE: Comments on LIWP Community Solar Pilot Program Draft Guidelines

Dear Director Stout,

The California Housing Partnership Corporation (CHPC) is a leading expert on affordable housing policy and finance in California. This includes technical and policy expertise on low-income renter and affordable housing participation in clean energy, solar, energy efficiency, and water conservation programs such as those administered by the California Department of Community Services and Development (CSD). CHPC established the Green Rental home Energy Efficiency Network (GREEN) in 2010 to collaboratively increase access to energy efficiency, renewable energy, and water conservation resources for low-income renters and affordable housing properties. GREEN includes more than 50 nonprofit affordable housing organizations and public housing authorities throughout California that use environmental sustainability to preserve affordable homes and improve quality of life for low-income renters.

CHPC performs outreach and intake services for CSD's Low-Income Weatherization Program (LIWP) for large multifamily properties. We applaud CSD's leadership to promote renewable and affordable energy options that can reach multifamily affordable housing properties and low-income renters that are not able to benefit from on-site solar energy systems. We support CSD's approach to community solar and appreciate the thoughtful consideration of details recommended for the Program Design Outline – especially on eligible costs, customer enrollment, and community engagement.

1. Eligible Costs

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.

This financial support can help projects test innovative community solar models and scale workable solutions that provide renewable energy to Californians that are not able to benefit from on-site generation.

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2. Customer Enrollment and Service Plan

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. In particular, culturally sensitive and linguistically diverse marketing education and outreach can help subscribers make well-informed decisions about their energy use, electricity rates, and assistance programs. 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” (Page 15).

3. Community Engagement Plan

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. They balance flexible geographic siting requirements with local community involvement to promote project flexibility without compromising the integrity of a community solar system that supports local subscribers. We agree that proposals should be “evaluated on the robustness of the combination of activities performed or proposed to engage community stakeholders and the evaluation plan” (Page 16).

Thank you for your leadership and the opportunity to provide recommendations on CSD’s LIWP Community Solar Pilot Program Draft Guidelines.

Respectfully submitted,

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July 26th, 2018

GRID Alternatives Comments on CSD LIWP Community Solar Pilot Program Draft Solicitation

Section or Topic	Comment
<p>4. B. Eligible Costs (page 13)</p> <p>'Funding a loan loss reserve or other payment guarantee fund to protect against late or non-payments by participants'</p>	<p>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)</p>
<p>i. Minimum Qualifications (Page 20)</p> <p>'Community Development Finance Institutions (must be a non-profit)'</p>	<p>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.</p>
<p>ii. Customer Enrollment and Service Plan (Page 24)</p> <p>'Contract Terms'</p>	<p>Contract terms should also disclose price escalators included for customers, if any</p>
<p>iii. Energy Cost Benefits for Low-Income Participants (Page 24)</p>	<p>CSD should encourage respondents to detail length of time cost benefits will be experienced, and generally favor projects that provide benefits for a longer period of time</p>
<p>vi. Stand-alone and Carve-out Projects (Page 17)</p> <p>'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.'</p>	<p>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.</p>
<p>ii. Customer Enrollment and Service Plan (Page</p>	<p>Respondent should clearly indicate plan for billing,</p>



<p>23)</p> <p>'Participant billing or other subsidy arrangements, including terms and conditions'</p>	<p>or otherwise transferring benefits to low-income customers, including any necessary changes to utility billing software, and status / 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>Proposal Scoring Criteria - Attachment 13 (Page 61)</p>	<p>Project Burdens and Co-benefits should be separate evaluation criteria and a higher weighting should be give to Co-benefits, as a standalone</p> <p>Community Engagement Plan is also an essential component of a successful project and should receive higher weighting</p>

Outside of the above comments, GRID believes the draft solicitation is strong and will meet the overall goals of the Community Solar Pilot.

Contact:

Tom Figel
Policy & Regulatory Manager - GRID Alternatives
(303) 968-1631



Department of Community Services

And Development

2389 Gateway Oaks Drive , Ste , 100

Sacramento , California 95833

Attention ;

Tina Schaffer

Re ;

Solar Pilot Program 07/25/2018

I live in Chula Vista California 91911 , in a Senior Citizen Mobile Home Park , We the residents of 501 Anita St. Granada Mobile Estates , own our Coaches (trailer) and have invested in the upgrade and modernizing our Mobile Homes , and have lived her for many years , and plan to live here for many more ,

However , when I applied for solar , with the GID
PROGRAMME for the low income .I was told we qualified
However , because we do not own the land ,where are
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 saving the
residents of Granada Mobile Estates , I am a resident
of the Mobile Home Park , for Senior Citizen , and am a
low income resident , who would benefit from the
Solar Pilot Program .

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 ,
We should be granted free solar systems for the low
income , and not excluded because we live in a (trailer)
Coach ,

Very Truly Yours

Jimmy Rodriguez

501 Anita Street # 174

Chula Vista California 91911