BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a Successor to Existing Net Energy Metering Tariffs Pursuant to Public Utilities Code Section 2827.1 and to Address Other Issues Related to Net Energy Metering.	Rulemaking 14-07-002 (Filed July 10, 2014)

OPENING COMMENTS OF THE GREENLINING INSTITUTE ON PROPOSALS FOR NET ENERGY METERING ALTERNATIVES FOR DISADVANTAGED COMMUNITIES

MADELINE STANO
Energy Legal Counsel
The Greenlining Institute
360 14th St, 2nd Floor
Oakland, CA 94612
Telephone: (510) 809-1820
Fax: (510) 926-4010
Email: MADELINES@GREENLINING.ORG

STEPHANIE CHEN
Energy & Telecommunications Director
The Greenlining Institute
360 14th St, 2nd Floor
Oakland, CA 94612
Telephone: (510) 898-0506
Fax: (510) 926-4010
Email: STEPHANIEC@GREENLINING.ORG

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1) Introduction

Pursuant to the California Public Utilities Commission's ("CPUC" or "Commission") March 14, 2017 *Administrative Law Judge Ruling Seeking Updated Proposals and Comments on Alternatives for Disadvantaged Communities ("Ruling")*, The Greenlining Institute ("Greenlining") respectfully submits the following comments on proposals filed by several parties on April 24, 2017.

Greenlining's comments focus predominantly on emphasizing the need for a suite of alternatives tailored to and redressing the diverse barriers disadvantaged communities face to benefiting from renewable distributed energy generation. Greenlining urges the Commission to use CalEnviroScreen to define disadvantaged communities and at the same time not necessarily limit its program eligibility requirements to just that. Greenlining views this proceeding as an incredible opportunity to bring the many benefits of solar to several communities that face barriers to access.

Greenlining appreciates the breadth of innovative proposals submitted for disadvantaged community ("DAC") alternatives, and looks forward to further evaluating and supporting their implementation.

2) The Commission Should Adopt a Suite of DAC Alternatives.

Greenlining urges the Commission to adopt a strong suite of DAC alternatives that will remove the diverse barriers currently denying the benefits of solar adoption to customers in low income and disadvantaged communities. The California Energy Commission ("CEC") identified an array of distinct challenges facing customers within low income and disadvantaged communities to accessing solar photovoltaic energy generation as well as other renewable energy in its *Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities*[1] ("Barriers Report"). The Barriers Report summarizes five key barriers faced by low income and disadvantaged communities including low home ownership rates, complex needs, ownership, and financial arrangements for low-income multifamily housing, insufficient access to capital, building age and remote or underserved communities.[2]

The manner in which these barriers play out in individual customers' lives varies tremendously according to whether they own or rent their residence, their location geographically within the state, the financial and physical infrastructure within their community, and a number of other political and cultural factors. For example, a low-income homeowner in rural Arvin faces different opportunities and barriers to accessing solar than a low-income family renting in multi-unit housing in Wilmington or a resident of a tribal nation. In recognition of the complexity and specificity of challenges facing these diverse communities, the Barriers Report tailored individual policy recommendations to each specific barrier.

We encourage the Commission to adopt a similar approach in this proceeding by providing an array of alternatives that redress the most barriers facing solar growth in low-income and disadvantaged communities. No one solution will meet the diverse needs of low-income and disadvantaged communities. The Commission has an incredible opportunity and obligation to adopt varied alternatives ensuring customer growth in low-income and disadvantaged communities.

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[1] Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities, Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities (Dec. 2016), http://www.energy.ca.gov/sb350/barriers_report/ (last accessed May 26, 2017).
[2] *Id*.

3) The Commission Should Define Disadvantaged Communities with CalEnviroScreen.

Greenlining proposes a definition distinct from its previous position in this proceeding.[3] Greenlining believes its streamlined definition in conjunction with recommendations for alternative eligibility criteria will meet our goals of removing barriers to participation for those in need and siting more solar in disadvantaged communities.

Consistent with many proposals in this proceeding and the Barriers Report, we recommend adopting the definition of disadvantaged communities put forth by CalEPA. "CalEPA has designated disadvantaged communities as those that scored at or above the 75th percentile using the California Communities Environmental Health Screening Tool ("CalEnviroScreen") method for ranking communities that are afflicted by environmental and socioeconomic issues."[4] In agreement with Sustainable Economies Law Center ("SELC"), California Environmental Justice Alliance ("CEJA") and Joint Solar Parties, the Commission should align this definition with its approach from SCE and SDG&E's EV pilot program, "finding it reasonable to define the eligible disadvantaged communities as the top quartile of census tracts per the CalEnviroScreen scores on either a state-wide a utility-wide basis—whichever is broader."[5] The Commission should adopt this definition across its programs and proceedings in order to ease program implementation, facilitate market certainty, and continue to redress unique barriers faced by these communities highly overburdened by pollution.

We urge the Commission to allow the sound science of CalEnviroScreen to determine the definition of a disadvantaged community instead of defining and redefining the term to suit particular policy goals of different programs. The Commission may meet these additional goals through other avenues. The Office of Health Hazard Assessment ("OEHHA") developed CalEnviroScreen and continues to update it to identify populations severely overburdened by multiple sources of pollution and that are

[3] Greenlining Institute Comments on NEM Successor Proposals, September 1, 2015, 3-6.
[4] Barriers Report at 84.
[5] D.16-01-045; D-16-01-023.

especially vulnerable to its effects.[6] Section 2827.1(b)(1) places a requirement on the Commission to promote growth in these communities. The Commission may still decide to meet multiple policy goals and serve other low-income populations, for example, through alternatives adopted in this proceeding. The Commission should reflect these additional policy goals in the eligibility requirements for select alternatives approved under this proceeding, rather than in the disadvantaged community definition. *Who may participate in a program that intentionally serves disadvantaged communities is a separate question from what constitutes a disadvantaged community*. The definition of a disadvantaged community need not wholly constrain implementation of Section 2827.1(b)(1).

4) The Commission Should Design Alternatives Eligibility Requirements to Meet Complimentary Policy Goals.

The Commission should design the eligibility requirements to participate in a program under this proceeding according to both the requirements of Section 2827.1(b)(1) and its own complimentary policy goals. We encourage the Commission to consider prioritizing access to solar by 1) low-income customers not residing in disadvantaged communities, and 2) residents of tribal nations as complementary policy goals. The Barriers report identifies several unique barriers these populations face, and Greenlining asserts that the alternatives adopted in this proceeding can simultaneously promote growth of solar in disadvantaged communities and greater access for other low-income and tribal residents. We propose the siting of generation infrastructure occur in disadvantaged communities and prioritization of participation by residents in those communities.

At the same time, we encourage the Commission to consider opportunities where CARE customers, regardless of their location, could participate. As the Barriers Report states, "…not all low-income customers live in disadvantaged communities, so it is important for programs to address them as well."[7] When the Commission can address the

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[6] OEHHA, About CalEnviroScreen (2017), https://oehha.ca.gov/calenviroscreen (last accessed May 26, 2017).
[7] Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities, Low-Income Barriers Study, Part A: Overcoming

low-income barriers and tribal barriers simultaneously with disadvantaged community barriers, it should.

5) The Commission Should Evaluate Alternatives Proposals with Equity Principles.

In addition, Greenlining supports the Commission using the set of Guiding Principles developed by solar advocates and equity oriented stakeholders in this proceeding[8] and the three policy principles stated in the SELC and CEJA Equity VNM Proposal when selecting both alternatives and their corresponding eligibility requirements. These Guiding Principles are:

- Reduce Barriers to Participation.
- Efficient Service Customers from Diverse and Underserved Communities.
- Provide Meaningful Bill Savings to Reduce Customer's Energy Burden.
- Create New Pathways to Prosperity and Healthier More Empowered Communities.
- Protect Consumers and Make Participation Easy.

The SELC and CEJA Equity VNM policy principles[9] are:

- *Community Control*: Most of the project is owned or controlled by either residents of disadvantaged communities, directly or indirectly via any entity, or a nonprofit or government entity.
- *Community Prosperity*: The project is located within the same or an adjacent disadvantaged community.
- *Community Scale*: Limits on project's generating capacity.

Both sets of principles reflect the unique barriers low-income and disadvantaged communities face in adopting and generating solar in their areas and work to overcome them. Collectively these principles can redress many significant financial, structural,

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Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities (Dec. 2016), http://www.energy.ca.gov/sb350/barriers_report/ (last accessed May 26, 2017).

[8] Organizations signed onto these principles include Brightline Defense Project, California Environmental Justice Alliance, Center for Sustainable Energy, the Greenlining Institute, GRID Alternatives, Interstate Renewable Energy Council, MASH Coalition, Sustainable Economies Law Center, CALSEI, SEIA, and Vote Solar.

[9] *See* SELC and CEJA Proposal p.2.

geographic and cultural barriers. The Commission should use them as criteria for evaluating programs and eligibility requirements under this proceeding. We remind the Commission that no one solution will fit all populations or burdens and find these two sets of principles essential guidance to make those complex decisions.

6) AB 693 Implementation Does Not Satisfy Section 2827.1(b)(1) Mandate.

Greenlining joins most parties in this proceeding arguing the Commission should not treat its upcoming implementation of Assembly Bill 693 as complete satisfaction of Section 2827.1(b)(1) mandate for alternatives in disadvantaged communities. Assembly Bill 693 limits eligibility to and serves the needs exclusively of those residing in multifamily affordable housing. These criteria exclude the overwhelming majority of residents in disadvantaged communities[10] and therefore could not satisfy the Section 2827.1(b)(1) mandate. Most residents of disadvantaged communities reside in either smaller properties, single family residences, or residences that could not participate for other reasons. The Commission should develop a suite of alternatives that serves the greatest number of low-income and disadvantaged communities.

7) The Commission Should Adopt the Consensus from the 2015 Proposals on Additional Criteria for the NEM Successor Tariff.

Greenlining joins most in this proceeding and urges the Commission not to apply the additional criteria for NEM successor tariff set out in 2827.1(b)(1) to alternatives for disadvantaged communities. Disadvantaged communities face significant barriers to renewable generation and the Commission should prioritize removing these barriers. Adopting additional limits does not serve the purpose of 2827.1(b)(1).

8) The Commission Should Adopt Alternatives Evaluation Metrics to Track Growth and Complimentary Policy Goals.

Greenlining submits the following metrics for evaluating performance of any program selected in this proceeding.

- Growth of megawatts generated from distributed solar in disadvantaged communities.
- Growth of access to solar benefits for:

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[10] Barriers Report at A-4; A-6; A-13.

- residents of disadvantaged communities;
- low-income residents of disadvantaged communities (as a subset of the above);
- low-income residents outside of disadvantaged communities;
- residents of disadvantaged communities in the San Joaquin Valley pursuant to Assembly Bill 2672;
- rural, remote, tribal and other unserved residents.

These metrics are consistent with the 2827.1(b)(1) mandate and also provide the Commission the opportunity to incentivize and track complimentary policy goals removing barriers in other underserved communities. These metrics are also consistent with and intentionally reflective of the Barriers Report recommendations,[11] Guiding Principles, and Equity VNM Principles stated above.

9) Virtual Net Metering Proposals

Greenlining supports overarching elements of both Virtual Net Metering ("VNM") proposals put forth in this proceeding: Equity VNM and DAC VNM. We find these proposals, although distinct, complement one another and help demonstrate how a suite of alternatives can remove a greater number of barriers than one in isolation. Greenlining finds VNM programs and Green Tariff Shared Renewable ("GTSR") programs complimentary in principle. Greenlining supports targeted, holistic, and creative solutions for meeting 2827.1(b)(1) mandate.

1. Sustainable Economies Law Center and California Environmental Justice Alliance: Equity VNM

SELC and CEJA propose an essentially three-pronged program requiring community control, community proximity and community scale. Greenlining enthusiastically supports these program requirements and their underlying policy goals. First, promoting community ownership whether by a local government, community-based nonprofit or a collection of individuals multiplies the co-benefits of solar generation and keeps them within the generating disadvantaged community. Ownership provides more community control and the greatest opportunity to maximize and tailor

[11] *See* Barriers Report at 42 "Recommendation 6".

solar projects to meet many of their localized needs. It also allows the participating customers the opportunity to use the project to invest in other local small businesses, groups or entities. Ownership allows greater possibility for local hiring, job training and workforce development in a way that is responsive to the needs of a community.

Community proximity is an extremely important policy for several reasons. As stated in our previous comments in this proceeding, co-locating siting with customers creates co-benefits including local jobs, educational opportunities, increased property value and neighborhood pride. For example, the Barriers Report states the communities that benefited the most from renewable generation in California are low-income disadvantaged communities with higher levels of poverty and unemployment because it provided much needed jobs.[12] We also agree with SELC and CEJA that the Commission should support investing in projects of community scale. We find their argument[13] persuasive that projects under 1 megawatt face unique barriers and piloting this project can make great progress toward giving communities opportunities to scale solar to local needs.

Greenlining supports SELC and CEJA's rate design and market intervention to ensure disadvantaged community residents may participate in and prosper from a solar project in their community.[14] The Barriers Report documents at length the numerous financial barriers low-income and disadvantaged communities face to developing renewable energy in general, let alone under majority community ownership required by this proposal.[15] The Commission should adopt SELC and CEJA's approach and design an equitable rate that works to remove and not compound the financial barriers they face. The Commission found the rate structure proposed by SELC and CEJA to be appropriate to spur market transformation in the single family solar market under the California Solar Initiative, and it should now find it appropriate to spur market transformation for community-owned shared solar in disadvantaged communities.

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[12] *Id*. at 76-77.
[13] SELC and CEJA Proposal p. 4-5.
[14] *Id*. at 5.
[15] Barriers Report at 2.

Greenlining supports SELC and CEJA's use of our previously submitted labor rules and supplier diversity goals.[16] Requiring paid job creation, inclusion of workforce development components and further developing goals for contracting with diverse business, especially those within disadvantaged communities, would further multiply the benefits of a given solar project. The Commission should use this proceeding to support these vital economic developments. For the same reasons stated, the Commission should apply these workforce and supplier diversity goals to Joint Solar Parties DAC VNM proposal as well.

Finally, we encourage the Commission to view SELC and CEJA's proposal as essential market transformation for equitable solar in disadvantaged communities. This proposal provides clear guidance and policy responses to known barriers for disadvantaged communities. We support SELC and CEJA's proposal which will bring clean power to the people.

2. Joint Solar Parties: DAC VNM

Joint Solar Parties[17] submit a DAC VNM proposal which seeks to expand the existing VNM tariff for customers in disadvantaged communities. Their proposal in contrast to existing VNM is not limited to multi-tenant, multi meter properties where the renewable generation is located on the same property as the participating customers. Their proposal puts forth a 10% low income customer requirement and does not require co-location of solar projects and subscribing disadvantaged community customers.[18] Their proposal permits up to 25% of non-residential subscription and seeks to be financially attractive to residents in disadvantaged communities.[19]

Greenlining generally supports this proposal and finds it an important part of providing a solar option for everyone. Greenlining sees the proposal as making important progress from the existing VNM program and providing helpful insight to the Commission on developing these projects. Greenlining raises a few comments to further improve the proposal especially in the areas of customer eligibility and project siting.

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[16] SELC and CEJA Proposal p. 9-10.
[17] Proposal jointly submitted by Vote Solar, Solar Energy Industries Association ("SEIA"), and California Solar Energy Industries Association ("CALSEIA'").
[18] Joint Solar Parties Proposal p. 3-4.
[19] *Id*. at 5.

Regarding program eligibility, Greenlining questions the necessity of allowing up to 25% non-residential customers to participate without further definition or constraints. A big-box retailer does not face the same severe barriers to solar as government entities, small businesses, or community-based nonprofits in the area. Greenlining recommends that this non-residential subscription category should prioritize non-profits, small businesses, and government entities.

Regarding the low-income customer set-aside, Greenlining suggests increasing this pool to a number greater than 10%. Presumably under the proposed structure 65% of customers will be non-low income residential customers in disadvantaged communities. To maximize the number of beneficiaries of this program and the barriers removed by it, Greenlining encourages greater low-income participation. For context, 33% of the state's population live in low-income households.[20] Many disadvantaged communities are also low-income.[21] Under this proposal, what would happen if greater than 10% of low-income customers in disadvantaged communities desired subscription? How could they benefit from projects potentially located in their communities?

Greenlining questions Joint Solar Parties' limiting customer participation to disadvantaged communities.[22] As the Proposal states, shared solar provides many financial benefits to customers and restricting participation to only those in disadvantaged communities preempts those benefits from other low-income customers. Greenlining supports restricting siting of projects to disadvantaged communities, but recommends that the proposal be amended to allow participation by low income customers statewide as well as by residents of disadvantaged communities. Joint Solar Parties do include customers living in deed-restricted affordable housing within an IOU territory in their disadvantaged community definition.[23] Greenlining supports Joint Solar Parties expansion of program eligibility to low-income customers statewide. However, Greenlining does not believe this definition is the best way to achieve that goal. Limiting

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[20] Barriers Report at 12.
[21] Disadvantaged and Low-income Communities Investments https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm (last accessed May 26, 2017).
[22] Joint Solar Parties Proposal p. 4-6.
[23] *Id*. at 15.

participation by residents outside of disadvantaged communities to only those with rent protections excludes potentially more financially vulnerable customers who lack such protections and are at the mercy of the housing market.[24]

Restricting eligibility to residents of deed-restricted or rent-restricted affordable housing makes more sense in a program where solar is being installed on the site where customers live. However, low income customers in market-rate housing face the split incentive problem in accessing solar benefits, and as such are prime candidates to receive solar benefits from offsite shared solar since it does not involve the building owner and therefore does not raise split incentive concerns. In Joint Solar Parties DAC VNM Proposal, Greenlining suggests allowing eligibility to a broader group of low income customers.

Additionally, Greenlining discourages requesting credit scores from any customer, especially those identified as low-income. This would place a significant barrier to participation for many customers and is not necessary for the proposal's success. The Barriers Report identifies poor credit scores as a barrier for low-income residents that precludes them from many existing renewable energy programs.[25] Since the program is a VNM proposal, replacing one subscriber for another is relatively easy especially when weighed against the barrier to participation a credit score requirement creates.[26]

Finally regarding siting of projects, Joint Solar Parties proposal lacks specific criteria for siting decisions. Greenlining encourages development of specific siting criteria to maximize potential benefits of the program. Greenlining recommends prioritizing sites beneficial to disadvantaged communities over others and, as PG&E suggests in its proposal, prioritizing projects with demonstrated community interest.[27]

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[24] The CEC's Barriers Report found that roughly one-fourth of California low income households live in subsidized affordable housing or receive housing vouchers (Barriers Report at A-4). This leaves roughly three-fourths of all low-income households in market rate housing, and ineligible to participate in DAC VNM as proposed.
[25] Barriers Report at 37.
[26] *See* SELC and CEJA Proposal p.8 (stating non-payment after two months warrants replacement).
[27] PG&E Proposal p.8-9.

10) GRID Alternatives Proposal

GRID Alternatives proposes extending and expanding Single Family Affordable Solar Housing ("SASH") and supporting DAC VNM. Greenlining supports expanding the existing SASH program as it provides strong workforce benefits as well as access to solar for low-income families. Greenlining supports including SASH as part of a suite of options for disadvantaged communities. Greenlining lifts up the strength of SASH's Third-Party Owner model placing GRID Alternatives as a financial intermediary for customers. This role facilitates easy customer participation and education without increasing financial risks associated with the project to economically vulnerable low-income customers. Greenlining commends GRID Alternatives' extensive and culturally specific marketing, outreach and support. Greenlining recommends using their six-language outreach strategy[28] as a model for all projects in this proceeding to ensure diverse and meaningful participation.

Greenlining finds the eligibility criteria of low-income owner-occupied compliant affordable single-family homes for expanded SASH consistent with the purpose of this program. Greenlining recognizes these criteria limit the number of residents in disadvantaged communities eligible to participate. However, this program in as part of a suite of alternatives may serve a broader group and other distinct subpopulations. GRID Alternatives argues the *primary* barrier to accessing solar is financial and tailored their program to solve that barrier.[29] The Barriers Report, however, found disadvantaged communities, rural communities, tribal communities and other underserved communities face additional barriers to accessing the benefits of solar as well.[30] Greenlining encourages a more holistic identification of the barriers disadvantaged communities face and more comprehensive integration of them in the suite of alternatives adopted by the Commission. Greenlining supports and appreciates GRID Alternatives highlighting and working to address the barriers faced by rural and tribal communities in this proposal.[31]

[28] GRID Alternatives Proposal p. 12.
[29] *Id*. at 17-18.
[30] Barriers Report at 2.
[31] GRID Alternatives Proposal p. 35.

11) Green Tariff Shared Renewables Proposals

Several parties propose alternatives improving upon the Green Tariff Shared Renewable program ("GTSR") including Pacific Gas & Electric ("PG&E"), The Utility Reform Network ("TURN"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SDG&E"). Greenlining supports reforming GTSR to better meet the needs of low-income and disadvantaged communities. Greenlining supports current proposed legislation Senate Bill 366 which also seeks to give low-income and disadvantaged community residents greater access to shared solar. Greenlining finds Senate Bill 366 complimentary to reforming the program in this proceeding.

1. PG&E Proposal

PG&E proposes its Solar CARE Plus program building off of the existing GTSR program. Solar CARE Plus would allow CARE eligible customers to receive 10% bill savings and 100% of their annual electric usage supplied from a pool of solar projects in disadvantaged communities.[32]

Greenlining supports the goal of 10% bill savings at the heart of PG&E's proposal thereby making the benefits of GTSR more accessible. However, Greenlining disagrees with PG&E's proposed eligibility requirements and funding sources. PG&E limits participation exclusively to CARE eligible residential customers in disadvantaged communities. This decision would seem to make their program design more expensive than other shared solar proposals at $5 million dollars per year.[33] Greenlining suggests broadening the eligibility to include non-residential customers like small businesses, community-based organizations, schools and libraries as well as higher income residents. Greenlining believes that a more balanced approach in program eligibility will help reduce program costs. We advocate for an application of shares to low-income customers, higher-income residential customers, and non-residential customers similar to that proposed by Joint Solar Parties, as modified by our recommendations above. We believe big-box retailers should be excluded from eligibility because a utility project does not require the financial security of such an anchor customer.

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[32] PG&E Proposal p.2.
[33] *Id*. at 1.

PG&E proposes program funding from the Greenhouse Gas Reduction Fund ("GGRF").[34] As a preliminary matter, the Commission does not have legal authority to allocate GGRF funds in this proceeding. These funds are appropriated by the legislature. Secondly, the purpose of these funds is to reduce life-threatening pollution especially in low-income and disadvantaged communities.[35] Greenlining finds it inappropriate to attempt to allocate funds from a non-utility program to a utility. PG&E also identifies the GHG Allocation Fund as another source of funding.[36] While the Commission has the discretion to allocate up to 15% of these revenues for investments of this kind, implementation of AB 693 proposes using 10% of those revenues. 5% of these funds remain and Greenlining wonders if this proposal is their best use.[37]

Consistent with our argument in Section 6 of this filing, Greenlining does not support PG&E's argument that it's Solar CARE Plus program proposal alone and existing programs including implementation of Assembly Bill 693 satisfy the mandate of Section 2827.1. Greenlining discourages the Commission from adopting PG&E's argument that their Solar CARE Plus proposal should be considered as "the sole additional alternative program to be adopted."[38] Greenlining once again encourages the Commission to adopt a robust suite of alternatives to satisfy the mandate of Section 2827.1 and bring the benefits of solar to the most underserved Californians.

Greenlining supports PG&E prioritizing siting of projects in communities with demonstrated local interest. Greenlining believes this gives disadvantaged communities greater control of projects in their communities and ensures more opportunities to meet more local needs.

2. TURN Proposal

TURN proposes a NEM DAC alternative with three key components: 1) Modify the Environmental Justice component of GTSR program; 2) Expand SASH 2.0 to include sing-family housing units in disadvantaged communities; 3) Develop a comprehensive

[34] *Id*. at 1.
[35] *See* Senate Bill 535 (De León 2012); Assembly Bill 1550 (Gomez 2016).
[36] PG&E Proposal p.1.
[37] At the same time Greenlining supports SB 366 in its current language. SB 366 unlike PG&E's Proposal is a statewide program with a broader focus and larger public impact.
[38] PG&E Comments p. 6.

marketing and outreach program.[39] Greenlining generally supports TURN's efforts to increase the success of both GTSR and SASH. Greenlining specifically supports TURN's proposal for culturally specific and linguistically diverse marketing and outreach. Greenlining supports TURN's proposal for an independent statewide Marketing Education and Outreach program administrator.[40] Greenlining believes that an independent administrator would increase the likelihood of greater enrollment and help to remove existing barriers for participation.

3. SCE Proposal

SCE proposes a $5 million pilot program combining energy storage systems with MASH facilities in disadvantaged communities.[41] SCE targets its pilot to the top 5 percent of most overburdened disadvantaged communities. SCE also proposed a DAC Community Clean Energy modification to the GTSR ("DAC GTSR") program that guarantees a 10% bill discount to enrollees.[42]

Greenlining supports reforming the current GTSR to share the benefits of solar more effectively with more low-income customers. As with PG&E's Proposal, Greenlining supports SCE's commitment bringing financial savings to Californians in need. Greenlining agrees with SCE that this discount will lead to greater participation by low-income customers and customers in disadvantaged communities.[43] Greenlining raises the same concerns on funding the DAC GTSR program through GGRF and GHG Allocation Funds stated above in PG&E Proposal. Greenlining supports SCE's suggestion that the Commission provide guidance on more appropriate funding sources for this program.

Regarding SCE's storage pairing solar pilot, Greenlining supports SCE's efforts to target its pilot to communities most in need of benefits. Greenlining believes targeting pilots and policy to those most impacted will benefit all Californians.[44] Solving access

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[39] TURN Proposal p.4.
[40] *Id*. at 10.
[41] SCE Proposal p.2.
[42] *Id*. at 3-4.
[43] *Id*. at 4.
[44] Centering policy on those most impacted by a problem allows for 'trickle up' market transformation where benefits flow from the overburdened to those less burdened.

issues in the top 5 percent most impacted communities will inform removing barriers across the state.

Greenlining also supports pairing and piloting energy storage systems with solar development in general. Greenlining agrees with SCE that pairing these technologies helps maximize the benefits of solar to customers and the grid. Customers can hedge the financial risks of solar with energy storage. Storage allows financial savings through time-shifting solar power to be used during peak periods and reducing, or in some cases eliminating, demand charges.[45] Solar systems with energy storage are found to be more responsive to changing utility pricing signals, and can triple the net utility bill savings when compared to solar alone. Energy storage could improve the feasibility of solar project financing by as much as 60 percent.[46] Not only does the combination of solar and storage in affordable housing have the potential to reduce tenants' monthly energy costs, it also will help keep California's affordable housing affordable by reducing owners' energy costs. This investment is critical as California's income gap continues to grow. Greenlining believes storage and solar pairing can increase the growth of solar in disadvantaged communities.

Greenlining disagrees with SCE's argument that implementation of Assembly Bill 693 satisfies the requirements of Section 2827.1 for reasons stated in Section 6 of this filing above.

4. SDG&E Proposal

SDG&E proposes a program for CARE customers in eligible disadvantaged communities to receive 100% renewable energy from its territory without additional rate premiums. SDG&E proposes a new SolarAll program and tariff to ensure GTSR remains cost-neutral for non-participants. It utilizes their current green tariff procurement facilities, existing resources and program. Greenlining, as stated above, supports GTSR reform as part of a suite of options to promote solar growth in low-income and disadvantaged communities.

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[45] Clean Energy Group, *Solar Risk How Energy Storage Can Preserve Solar Savings in California Affordable Housing* available at http://www.cleanegroup.org/ceg-resources/resource/california-solar-risk (last accessed May 36 2017).
[46] *Id*. at 2.

Greenlining notes, as have others in this proceeding, that the current GTSR is cost-prohibitive and a barrier to many low-income and disadvantaged community residents. Greenlining supports SDG&E's efforts to make sure the program does not increase CARE customer's bills. However, Greenlining thinks this proposal can go further. Greenlining encourages the Commission to prioritize making GTSR more financially accessible to CARE customers. Ensuring the program's neutral cost to nonparticipants is an important feature of GTSR more broadly. However, here the cost at issue is the narrow fee to buy down the participation premium for a sub-group of customers. The impact to non-participants would be minimal and allows serving the public purpose low-income affordability. Greenlining thinks the Section 2827.1 mandate is in the public interest as SDG&E even suggests by partially funding the program through the Public Purpose Program charge.[47]

Greenlining encourages placing a time limit on SDG&E's use of existing renewable projects in its GTSR proposal. Section 2827.1 mandates growth of solar in disadvantaged communities. Relying on existing sources discourages growth and is at cross purposes with the goal of this proceeding. Additionally, solar projects now are much more affordable than they once were. Existing projects will almost certainly be more expensive per megawatt than a new construction. Discouraging the use of older projects increases the likelihood of less expensive prices per megawatt and therefore participation overall.

Finally, Greenlining raises the same concerns on funding the program through the GHG Allocation Funds stated above in PG&E Proposal.

12) Conclusion

Greenlining looks forward to the continued opportunity to provide feedback on and support the implementation of the DAC alternative proposals, and urges the Commission to do all it can to bring the many benefits of solar to the California communities that need them the most.

RESPECTFULLY SUBMITTED,

/s/ Madeline Stano

[Signature Continued on Next Page]

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[47] SDG&E Proposal p.20.

MADELINE STANO
Energy Legal Counsel
The Greenlining Institute
360 14th St, 2nd Floor
Oakland, CA 94612
Telephone: (510) 809-1820
Fax: (510) 926-4010
Email: MADELINES@GREENLINING.ORG

/s/ Stephanie Chen

STEPHANIE CHEN
Energy & Telecommunications Director
The Greenlining Institute
360 14th St, 2nd Floor
Oakland, CA 94612
Telephone: (510) 898-0506
Fax: (510) 926-4010
Email: STEPHANIEC@GREENLINING.ORG