

Decision **PROPOSED DECISION OF ALJs HECHT and KAO**
(Mailed 10/31/2017)

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

(See Appendix C for Appearances)

**DECISION ADOPTING IMPLEMENTATION FRAMEWORK FOR
ASSEMBLY BILL 693 AND CREATING THE SOLAR ON MULTIFAMILY
AFFORDABLE HOUSING PROGRAM**

Table of Contents

Title	Page
DECISION ADOPTING IMPLEMENTATION FRAMEWORK FOR ASSEMBLY BILL 693 AND CREATING THE SOLAR ON MULTIFAMILY AFFORDABLE HOUSING PROGRAM.....	1
Summary	2
1. Background	3
1.1. Legislative Background	3
1.1.1. Requirements of AB 693	4
1.2. Procedural Background.....	5
1.3. Affordable Housing Programs Under the California Solar Initiative ...	7
2. Introduction and Plan of this Decision	8
3. The SOMAH Program	9
3.1. Program Eligibility	10
3.1.1. Specific Eligibility Requirements	12
3.2. Distribution of Program Benefits	14
3.2.1. Use of VNEM	14
3.2.2. Tenant and Common Area Load Allocation.....	16
3.2.3. Ensuring Customer Benefit.....	18
3.2.3.1. Exclusion from Mandatory Time of Use Tariffs	18
3.2.3.2. Tenants Must Receive the Full Benefit of VNEM Credits...	21
3.2.3.3. Note on Benefit for Tenants in Federally Subsidized Affordable Housing	22
3.3. Additional Requirements for Participating Service Providers.....	24
3.3.1. Third-Party Ownership Requirements	24
3.3.2. Providing Economic Development Benefits Through Job Training and Local Hiring	25
3.3.3. Energy Efficiency Services and Coordination with Other Clean Energy Programs.....	27
3.4. Applicability of Additional MASH Program Requirements	28
3.5. SOMAH Program Budget and Funding	30
3.5.1. Funding Calculations.....	30
3.5.2. IOUs’ Funding Contributions and Accounting	34
3.5.3. IOU Accounting.....	37
3.5.4. Allocation of Funding Between DAC and Low-Income Tenant Qualification Paths.....	37
4. Incentive Structure	39

Table of Contents (cont.)

Title	Page
4.1. Incentive Step-Down	43
5. Program Administration	44
5.1. Administrative Structure	44
5.2. Participation of Liberty and PacifiCorp	48
5.3. Major Responsibilities of the Program Administrator	50
5.4. The Installation of SOMAH Projects by the Project Administrator.....	52
6. Implementation Plan and Next Steps.....	53
6.1. Selection of a Program Administrator	53
6.2. Program Implementation via a Tier 3 Advice Letter	54
7. Evaluation, Measurement, and Verification.....	56
8. Energy Division Budget and Activities.....	57
9. 2020 Program Review	58
10. Comments on Proposed Decision.....	58
11. Assignment of Proceeding	62
Findings of Fact.....	62
Conclusions of Law	65
ORDER	68

Appendix A - Public Utilities Code Section 2870

Appendix B - Summary of Solar on Multifamily Affordable Housing Program

Appendix C - Appearances

**DECISION ADOPTING IMPLEMENTATION FRAMEWORK FOR
ASSEMBLY BILL 693 AND CREATING THE SOLAR ON MULTIFAMILY
AFFORDABLE HOUSING PROGRAM**

Summary

Assembly Bill (AB) 693 (Eggman), Stats. 2015, ch. 582, creates the Multifamily Affordable Housing Solar Roofs Program, with up to \$100,000,000 annually in funding from Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp's (collectively the investor-owned utilities) share of greenhouse gas allowance auction proceeds.¹ This decision adopts a new Solar on Multifamily Affordable Housing (SOMAH)² Program as a vehicle for implementation of AB 693, and provides the framework for the program's implementation. Specifically, this decision addresses program goals, eligibility requirements, program administration, and program funding, and provides guidance for the selection and ultimate responsibilities of a statewide Program Administrator (PA).

Consistent with AB 693, the new SOMAH program will provide incentives for the installation of solar distributed generation projects sited on existing multifamily affordable housing. In doing so, the SOMAH program will ensure that the benefits of such solar generation systems, especially the bill credits customers can receive with net-metered on-site solar generation, accrue primarily to the tenants of participating properties. This program, while similar

¹ See Public Utilities Code Section 2870(c).

² In view of the number of somewhat similar acronyms related to extending customer-sited solar installations to affordable housing, we have chosen one that is likely to reduce confusion among programs.

in structure and goals to the Multifamily Affordable Solar Housing program, is a new program with different rules and eligibility requirements, and a new funding source.

Under the framework created in this decision, the AB 693 program will be run by a single, statewide PA to be chosen by the Commission's Energy Division from entities responding to a Request for Proposal (RFP) as described in this decision. This decision is intended to provide the basic requirements necessary to launch the RFP process and yield an effective statewide PA. Once a PA is selected, the PA will submit a Tier 3 Advice Letter containing specific proposals for implementing the policies adopted here, as further discussed below. The Commission may provide further direction on the contents of this Tier 3 implementation Advice Letter through one or more future Commission decisions or resolutions.

1. Background

1.1. Legislative Background

Assembly Bill (AB) 693 created the Multifamily Affordable Housing Solar Roofs Program to provide financial incentives for the installation of solar photovoltaic (PV) energy systems on multifamily affordable housing properties throughout California. The statute, among other things, prescribes criteria for participation in the incentive program; identifies a funding source for the program; sets targets for installation of solar PV systems; identifies various required elements for the program; and gives direction to the Commission on administration of the program.

Under AB 693, these services are to be funded using a percentage of the proceeds from the sale of greenhouse gas allowances allocated to California's investor-owned utilities (IOUs) for the benefit of ratepayers. Senate Bill (SB) 92,

adopted with the 2017-2018 State Budget in late June, clarifies the funding amounts available to support activities authorized by AB 693.³ The complete text of AB 693, as amended by SB 92 and codified at Pub. Util. Code § 2870, is attached to this decision as Appendix A.⁴

1.1.1. Requirements of AB 693

AB 693 creates an incentive program to encourage the installation of solar energy systems⁵ to serve multifamily affordable housing with funding available for up to 10 years, between 2016 and 2026. The purpose of this program is to make solar energy, and the bill savings from on-site solar generation, available to low-income ratepayers throughout California. By subsidizing the costs of solar generation on certain types of multifamily affordable housing and allocating net energy metering (NEM) tariff credits associated with the system's generation to tenants and common areas of the property, AB 693 established the program to provide bill savings to low-income households that would otherwise be unable to benefit from on-site solar generation.

Under AB 693, the Commission must ensure that the program is administered efficiently, with administrative costs not to exceed 10% of the total

³ Section 83(c) of SB 92 provides:

(c) The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or 66.67 percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Solar Roofs Program, beginning with the fiscal year commencing July 1, 2016, and ending with the fiscal year ending June 30, 2020. The commission shall continue authorizing the allocation of these funds through June 30, 2026, if the commission determines that revenues are available after 2020 and that there is adequate interest and participation in the program.

⁴ All further references to sections are to the Public Utilities Code, unless otherwise specified.

⁵ Section 2870(c).

program budget. It has an overall target of installing at least 300 megawatts (MW) of generating capacity on qualified properties by 2030. Consistent with the requirements of AB 693, tariff credits accrued using the generation from Solar on Multifamily Affordable Housing (SOMAH) developments will be used primarily to offset the bills of tenants of qualifying properties. In addition, program service providers must produce economic benefits by providing job opportunities to residents of disadvantaged communities. Within these general guidelines, the Commission has discretion to determine program rules and implementation procedures.

1.2. Procedural Background

Earlier in this proceeding, the Administrative Law Judge's Ruling Seeking Comment on Assembly Bill 693 (October 21, 2015) (October Ruling) asked parties to comment on AB 693 in the context of the statutory requirement for the NEM successor tariff to include "specific alternatives designed for growth [of customer-sited renewable distributed generation] among residential customers

in disadvantaged communities.”⁶ Comments were filed November 2, 2015.⁷

Reply comments were filed November 9, 2015.⁸

In Decision (D.) 16-01-044, the Commission decided to address both the implementation of AB 693 and the development of NEM alternatives for disadvantaged communities in the second phase of this proceeding.⁹ Following that decision, the Administrative Law Judge’s Ruling Seeking Proposals and Comments on Implementation of Assembly Bill 693 (Ruling Seeking Proposals), issued on July 8, 2016, requested proposals for implementing AB 693. Proposals and comments were filed August 3, 2016.¹⁰ Reply comments were filed August 16, 2016.¹¹

⁶ Section 2827.1(b)(1).

⁷ Comments were filed by Brightline Legal Defense Fund (Brightline), and the Salvadoran American Leadership and Educational Fund (SALEF) (jointly); California Environmental Justice Alliance (CEJA); Center for Sustainable Energy (CSE); Custom Power Solar; Everyday Energy; Greenlining Institute; GRID Alternatives; Interstate Renewable Energy Council (IREC); MASH Coalition; Office of Ratepayer Advocated (ORA); Pacific Gas and Electric Company (PG&E); Southern California Edison Company (SCE); San Diego Gas & Electric Company (SDG&E); The Utility Reform Network (TURN); and Vote Solar, The Alliance for Solar Choice (TASC), Solar Electric Industries Association (SEIA), California Solar Electric Industries Association (CALSEIA) (jointly).

⁸ Reply comments were filed by CEJA; CSE; Everyday Energy; GRID Alternatives; IREC; MASH Coalition; ORA; PG&E; SDG&E; Sierra Club; TURN; and Vote Solar, TASC, SEIA, CALSEIA (jointly).

⁹ D.16-01-044 at 101-103; Finding of Fact 51.

¹⁰ Comments were filed by California Energy Storage Alliance (CESA), CALSEIA, CSE, City of Lancaster, Energy Freedom Coalition of America (EFCA), Everyday Energy, Greenlining, GRID Alternatives, IREC, Liberty Utilities (CalPeco Electric or Liberty) LLC, MASH Coalition, Marin Clean Energy, ORA, PacifiCorp, PG&E, SCE, SDG&E, TURN, and Vote Solar.

¹¹ Reply comments were filed by CALSEIA; CESA; CSE; EFCA; Everyday Energy; Greenlining; GRID Alternatives; MASH Coalition; Natural Resources Defense Council, California Housing Partnership Corporation, CEJA, National Housing Law Project, Brightline (jointly)(together, the Nonprofit Solar Coalition or NSC); ORA; PG&E; SCE; SDG&E; TURN; and Vote Solar.

This decision implements AB 693.

1.3. Affordable Housing Programs Under the California Solar Initiative

AB 693 creates an ambitious program to provide incentives for widespread adoption of customer-sited solar generation in multifamily affordable housing. AB 693 draws on the experience of previous programs aimed at expanding the adoption of solar generation in low-income communities, particularly the Multifamily Affordable Solar Housing (MASH) and Single-family Affordable Solar Housing (SASH) programs begun under the California Solar Initiative (CSI). These programs were created in compliance with the direction in AB 2723 (Pavley) Stats. 2006, ch. 864, which required the Commission to ensure that not less than 10% of overall CSI funds be used for installation of solar energy systems on “low-income residential housing,” as defined in the bill. In 2007 and 2008, the Commission adopted programs implementing this requirement. Specifically, in D.07-11-045, the Commission adopted the SASH program for qualifying low-income single-family homeowners, and in D.08-10-036, the Commission adopted the MASH program to provide incentives for solar installations on multifamily affordable housing.

In 2013, the Legislature passed AB 217 (Bradford), Stats. 2013, ch. 609, which authorized \$108 million in new funding for MASH and SASH; set a goal of 50 MW of installed capacity across both programs; and extended both programs until 2021, or the exhaustion of the new funding, whichever occurs first. Pursuant to this legislation, the Commission reauthorized both programs in D.15-01-027, which also made changes to program administration and eligibility requirements. Both programs have been evaluated by Navigant Consulting, most recently in a Market and Program Administrator Assessment of the

2011-2013 program years, completed in early 2016. The MASH Program is essentially closed at this time to new applications because all funds allocated to that program have been reserved for projects, with additional unfunded projects remaining on the program's waitlists in each utility territory.

2. Introduction and Plan of this Decision

The SOMAH program, while similar in structure and goals to MASH, is not simply a continuation of MASH. The program has distinct rules and eligibility requirements, including a focus on serving properties in disadvantaged communities. SOMAH also has a new funding source, GHG allowance proceeds, which is available to some of California's small and multi-jurisdictional electric utilities. This is in contrast to MASH, which was created as part of the California Solar Initiative and was funded solely by the three larger electric utilities. Based on party comments, the statutory requirements and informed by experience with MASH and SASH, this decision does the following:

- Describes the elements of the SOMAH program, consistent with the requirements of AB 693;
- Establishes policies governing the program's operation, including but not limited to funding mechanisms, basic eligibility requirements, and rules for distribution of project benefits;
- Identifies the funding source and budget for SOMAH;
- Adopts incentive levels and a step-down mechanism for adjusting those levels annually;
- Defines the general responsibilities of the state-wide Program Administrator (PA);
- Provides guidance to Energy Division for the anticipated Request for Proposal (RFP) process; and

- Provides that the PA shall file a Tier 3 implementation Advice Letter to propose specific procedures for implementing the program adopted here, and gives guidance to the PA on the contents of that Advice Letter.

This decision delegates to Commission staff, and the statewide PA, once it is chosen, the development of specific implementation procedures as described in this decision, to be approved by the Commission as necessary in future decisions or resolutions.

3. The SOMAH Program

In compliance with the terms of AB 693, the SOMAH program will provide significant subsidies for the installation of solar photovoltaic (PV) energy generation systems sited on qualifying multifamily affordable housing properties. Like the MASH program, SOMAH is targeted at existing multifamily affordable housing¹² that meets the definition of low-income residential housing set forth in Section 2852(a)(3)(A). Specifically, this means multifamily housing financed with low-income housing tax credits, tax-exempt mortgage revenue bonds, general obligation bonds, or local, state or federal loans or grants. To be qualified for SOMAH, properties must also be occupied by households with incomes at or below 60% of the area median income¹³ or be located in a disadvantaged community as identified by the California Environmental Protection Agency (CalEPA).¹⁴ We expect the program to significantly reduce

¹² D.06-01-024 created a separate component of CSI specifically for residential new construction (now known as the New Solar Homes Partnership (NSHP) to be overseen by the California Energy Commission (CEC). D.06-01-024 Appendix A at 24.

¹³ As defined in subdivision (f) of Section 50052.5 of the Health and Safety Code.

¹⁴ Pursuant to Section 39711 of the Health and Safety Code.

the costs of solar PV systems serving multifamily affordable housing, and as a result encourage more widespread development of these systems for the benefit of multifamily affordable housing tenants.

The following sub-sections establish the framework for operation of the SOMAH program based on the requirements of the authorizing legislation. The major program policies adopted here include program eligibility requirements, administrative structure, program incentives, and additional program activities required in statute. In addition, this decision establishes methods for the calculation of the program budget and allocation of that budget among the state's electric IOUs, along with related accounting procedures. Appendix B contains a brief summary of the program as adopted in this decision.

This decision adopts basic program elements and policies sufficient to allow selection of a PA via an RFP process, and establishes minimum requirements for some statutorily required program activities. We expect that a future Commission may address additional program parameters not addressed here, through one or more future Commission decisions or resolutions. In addition, we anticipate that the chosen PA will propose specific procedures to ensure compliance with the requirements outlined below, which will be considered in a future decision or resolution.

3.1. Program Eligibility

Section 2870(a)(3) defines the circumstances under which a residential property will be eligible to receive SOMAH incentives. Consistent with the statute, SOMAH will be available to properties with at least five rental housing

units that are operated as deed-restricted low-income residential housing¹⁵ that meet certain additional requirements. Specifically, either the property must be located in a disadvantaged community (DAC) as identified by CalEPA pursuant to Health and Safety Code (HSC) Section 39711,¹⁶ or at least 80% of the households in the property must have household incomes at or below 60% of the area median income.¹⁷

Though these basic eligibility requirements are established in statute, questions remain about how the determination of a specific property's eligibility should be made. Parties provided comments on the rules for determining program eligibility, including the application of the DAC and income eligibility requirements. In addition, parties address the appropriateness of serving properties in which some residents receive service from a Community Choice Aggregator (CCA), and whether the program should be limited to existing (rather than new) construction. This section addresses these issues and establishes the eligibility standards for participation in SOMAH. As discussed in Section 6.2., below, we require the PA to propose application procedures that ensure that participants meet all statutory requirements and the rules adopted here.

¹⁵ For the purposes of SOMAH, deed-restricted affordable housing is defined in Section 2852 (a)(3)(A)(i).

¹⁶ AB 693 requires that in the context of this program, disadvantaged communities are those identified by the California Environmental Protection Agency pursuant to California Health and Safety Code Section 39711. CalEPA defines disadvantaged communities as those scoring in the top 25% of census tracts statewide on a set of environmental, health, and socioeconomic data from 20 indicators. In addition, 22 census tracts in the highest 5% of CalEnviroScreen's Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as disadvantaged communities.

¹⁷ Area median income as defined in Section 50052.5 HSC.

3.1.1. Specific Eligibility Requirements

Based on statutory requirements and party comments, we adopt the following general eligibility requirements for SOMAH participation:

- 1) Property must have at least five residential housing units.
- 2) Property must be subject to either a deed restriction or regulatory agreement between the property owner and a financing agency under which the property is classified as affordable housing.
- 3) There must be at least 10 years remaining on the term of the property's affordability restrictions.
- 4) Rent for low-income tenants shall be maintained within required limits, as determined by the agency regulating the property as affordable housing.
- 5) Units must be separately metered and eligible for a virtual NEM (VNEM) tariff.
- 6) Properties with CCA customers may participate if the serving CCA has a VNEM tariff.
- 7) Only existing buildings are eligible; other programs (such as the New Solar Homes Program (NSHP), through the CEC) exist to assist new construction projects.¹⁸

To facilitate qualification, the PA should maintain a list similar to that proposed by the Nonprofit Solar Coalition (NSC) of public entities that provide

¹⁸ Though the NSHP in its current form is authorized only until June 30, 2018, the IOUs' 10-year Energy Efficiency Rolling Portfolio Business Plans propose robust programming and funding to support multifamily new construction Zero Net Energy efforts. While these programs may not provide direct incentives for PV, combined with aggressive building codes for new construction these outside developments may naturally push new affordable housing to proactively design and plan for onsite generation. For these reasons, we find that SOMAH funding is better spent on installation of solar generation on existing properties. In addition, future iterations of the New Solar Homes Program (NSHP) or similar programs may provide direct incentives for PV in multifamily new construction.

financial assistance for multifamily affordable housing based on state and federally monitored compliance with annually updated rent and income restrictions. This list will be similar to the list in the current MASH Handbook. Properties receiving assistance through an entity on this list may provide the deed restriction or agreement under which it receives that assistance, along with certification that the property has at least five units and that either the property is in a DAC or the residents meet the income eligibility requirements. We decline to limit eligibility for properties subject to regulatory agreements to only those with finance agreements with agencies on this pre-approved list.

AB 693 specifies that income eligibility shall be based on area median income as defined in Section 50052.5 of the HSC. HSC Section 50052.5(f), in turn, refers to HSC Section 50093, which requires the Department of Housing and Community Development (DHCD) to publish, on an annual basis, area median income numbers for use in certain state housing assistance programs.¹⁹ We adopt the income requirements specified in AB 693 for program eligibility, as follows:

- 80% of property residents must have incomes at or below 60% of the area median income as determined by the DHCD.

A property that does not meet this primary income criterion may also qualify for SOMAH incentives if it is located in a DAC as defined in Section 2870(a)(3)(A). We adopt this statutorily required alternate path here. We find that Section 2870(a)(3) requires the Commission to use the specific DAC definition used by CalEPA pursuant to HSC Section 50052.5. Under this definition, DACs are areas that score in the top 25% of census tracts statewide on

¹⁹ Income limits developed in compliance with HSC 50093 are published annually at <http://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits.shtml>.

a set of environmental, health, and socioeconomic data from 20 indicators. In addition, 22 census tracts in the highest 5% of CalEnviroScreen's Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as disadvantaged communities.²⁰ Use of this definition for SOMAH as required by Section 2870(a)(3)(A) does not preclude the Commission from adopting a modified DAC definition for other programs intended to assist DAC residents.

As authorized in Section 2870 (b)(1), projects installed under SOMAH will count towards the satisfaction of the Commission's obligation to ensure that NEM tariffs include options for expanding availability of solar generation in DACs. In addition, the Commission expects to adopt additional options to encourage installation of solar generation systems in disadvantaged communities in another decision in the near future.

The PA, once chosen, will propose application procedures and eligibility documentation and requirements via a Tier 3 implementation Advice Letter, using a process described in Section 6.2., below.

3.2. Distribution of Program Benefits

3.2.1. Use of VNEM

Section 2870(g)(1) requires that the utility bill reductions in the SOMAH program must be:

. . .achieved through tariffs that allow for the allocation of credits, such as virtual net metering tariffs designed for Multifamily Affordable Solar Housing Program participants, or other tariffs that may be adopted by the commission pursuant to Section 2827.1.

²⁰ EPS report: Designation Of Disadvantaged Communities Pursuant To Senate Bill 535 (De León), April 2017 at 2. *See* <https://calepa.ca.gov/wp-content/uploads/sites/34/2017/04/SB-535-Designation-Final.pdf>.

Parties agree that the implementation of this section should be through the use of existing VNEM tariffs. As EFCA and Vote Solar point out, the Commission in D.16-01-044 committed to continue VNEM as part of the NEM successor tariff. As in the existing MASH program, VNEM tariffs provide a mechanism for allocating bill credits from system generation among the property occupants, including both common area electric accounts and the accounts of tenants. Though the statute also allows for the development of other tariff mechanisms to accomplish this purpose, we find that there is no need to create a new tariff mechanism at this time when a suitable mechanism already exists for the three largest electric IOUs. As suggested by multiple parties, the existing VNEM tariffs can be used as a basis for new or modified tariffs for all utilities in their implementation of SOMAH. As a result, the SOMAH program will use a VNEM tariff to provide benefits to tenants through the allocation of credits.²¹

Participating utilities are ordered to file a Tier 1 advice letter designating a VNEM tariff for use by SOMAH participants within 90 days of the issuance of this decision. The advice letter may modify an existing VNEM tariff used for the MASH program, such as that used by MASH participants, to comply with this decision, or may develop a new VNEM tariff based on the VNEM tariff used for the MASH program, as appropriate. If needed, Energy Division may hold a public workshop to assist utilities, especially Liberty and PacifiCorp, in the development of an appropriate VNEM tariff.

²¹ Although CALSEIA, EFCA, Greenlining, GRID, and NSC suggest that master-metered properties should be eligible for SOMAH incentives, unless tenants have individual accounts to which bill credits can be applied, the VNEM tariffs cannot be used. This precludes the inclusion of master-metered property in the SOMAH program.

3.2.2. Tenant and Common Area Load Allocation

AB 693 requires that generation funded through SOMAH shall “be primarily used to offset electricity usage by low-income tenants.”²² There is consensus among the parties that the Commission should not interpret “primarily” to mean “exclusively.” Commenting parties recognize that some benefit for common areas will be needed in order to provide an incentive for property owners or managers (sometimes referred to as “host customers”) to participate in the program.²³ As parties note, without such an opportunity for common-area bill savings, host customers would lack an incentive to install solar generating systems on their properties.

Proposals for implementing this requirement range from allocating 80% of credits to tenants and 20% to common areas, to allocating 51% to tenants and 49% to common areas.²⁴ For example, GRID Alternatives and the NSC recommend that tenants be allocated a minimum of 51% of credits generated by the system, which would provide property owners with maximum flexibility to accrue savings. In contrast, ORA, TURN, and SCE recommend that tenants be allocated at least 80% of system credits, with other parties proposing percentages in between.

All proposals on the allocation between tenants and common areas that may be necessary to motivate participation are to some extent speculative, since

²² Section 2870(f)(2).

²³ CPS, EFCA, Everyday Energy, GRID, MASH Coalition, NSC, PG&E, and SDG&E take this position.

²⁴ ORA, SCE, and TURN advocate an 80%/20% split; CALSEIA, SDG&E, and Greenlining (with conditions) advocate 70%/30%; PG&E proposes 67%/33%; GRID and NSC propose 51%/49%. MASH Coalition proposes an allocation methodology based on system size.

there is no experience on which to base them. In contrast, the MASH program provides a higher incentive for projects that allocate more than 50% of benefits to tenant accounts,²⁵ but does not pay different incentive amounts for the capacity allocated to tenants and common areas. For the beginning of the SOMAH program, it is reasonable to require that tenants receive the majority of the benefits, but allow significant benefits to flow to common areas in order to maximize flexibility in system design and interest in the program from property owners. We find that, at this time, it is reasonable to require that tenants receive at least 51% of VNEM credits. This split will provide the maximum flexibility to property owners to tailor their projects to their particular circumstances, and should encourage a greater amount of development under this program while meeting the statutory requirement that systems “primarily” benefit tenants. This allocation can be revisited in the first SOMAH program evaluation, if appropriate.

The PA should design and propose in its Tier 3 implementation Advice Letter described in 6.2., below, a method of verifying that at least 51% of the electricity generated by a system receiving SOMAH incentives is used to offset electricity usage by tenants,²⁶ and that the load allocation of the solar energy system matches the incentive split between tenant and common area accounts.

²⁵ \$1.10 per Watt for projects allocating less than 50% benefit to tenants vs. \$1.80 per Watt for projects allocating more than 50% of benefits to tenants. See MASH Handbook at 31. http://www.gosolarcalifornia.ca.gov/documents/MASH_Handbook.pdf.

²⁶ It is possible that experience will show that a different allocation should, and feasibly could, be made. The PA should collect data to allow a determination, in the 2020 review, on whether to change the proportions in the allocation requirement.

3.2.3. Ensuring Customer Benefit

3.2.3.1. Exclusion from Mandatory Time of Use Tariffs

AB 693 requires the Commission to “ensure that electrical corporation tariff structure affecting the low-income tenants participating in the program continue to provide a direct economic benefit from the qualifying solar energy system.”²⁷ We interpret this provision of AB 693 to require the Commission to ensure that the bills of low-income tenants participating in SOMAH remain lower than they would have been without participation in the program. We will accomplish this, as discussed in the prior section, by requiring the SOMAH program to use the VNEM tariff to provide benefits to tenants through the allocation of NEM bill credits. In comments, parties suggest a variety of ways to ensure that tenants get bill reductions while taking service on the VNEM tariff and participating in the SOMAH program. These suggestions range from modifying the treatment of non-bypassable charges (NBCs) as set forth in D.16-01-044 for tenants in properties participating in SOMAH to exempting customers from the mandatory transition to time of use (TOU) rates currently required for all NEM customers.

At this time, we decline to adopt the recommendations of Everyday Energy, the MASH Coalition, and others, that we modify the treatment of NBCs for customers participating in SOMAH. The treatment of NBCs under the NEM tariff is currently under review in A.16-07-015, and we will not prejudge that proceeding or complicate it by addressing a related issue here. Similarly, we do not at this time adopt a discount to the fixed charges for tenants of SOMAH

²⁷ Section 2870 (g)(2).

properties, as requested by Everyday Energy.²⁸ We do, however, agree with a majority of parties that we should consider modifications to the currently required mandatory TOU rates²⁹ for the tenants in properties that receive SOMAH subsidies.³⁰

In particular, most non-utility parties recommend that mandatory TOU rates, which have the potential to raise overall bills for SOMAH participants, be modified for tenants in SOMAH properties (so-called “benefitting accounts”) in order to protect those customers from potential electric bill increases that may be caused by these changes. The MASH Coalition argues that tenants may not have the ability to take actions to reduce usage during peak times, and should not be penalized with higher bills under TOU rates for their property owner’s choice to participate in SOMAH. Based on a similar rationale, Greenlining recommends that tenants be completely exempt from TOU rates. Greenlining asserts that moving AB 693 customers “to TOU rates could dramatically reduce, or even eliminate, the economic benefits this program was primarily intended to deliver.”³¹ Greenlining also contends that, because of the small number of customers eligible for the program, “[e]ven if the program is fully funded and fully subscribed, the number of tenant beneficiaries will be exceedingly small as compared to the total number of households in California IOU territories, and therefore the impact of these customers remaining on tiered rates will be

²⁸ See, for example, Everyday Energy Opening comments at 27.

²⁹ D.16-01-044 Ordering Paragraphs 5-7.

³⁰ See, for example, PG&E Reply Comments at 2 and 12-13, SCE Reply Comments at 2 and 10-11, TURN reply comments at 8-9, and SDG&E Reply Comments at 4-5.

³¹ Greenlining comments August 3, 2016, at 8.

similarly negligible.”³² Parties note that the Commission could re-evaluate any modifications to TOU requirements during the required review of the SOMAH program in 2020.

The only parties that do not support modifying tariff structures, including TOU transition requirements, for AB 693 customers are the large IOUs. SCE, for example, asserts that “[w]aiving these requirements will undermine the only significant changes the Commission adopted for the NEM successor tariff in D.16-01-044.”³³ These utilities also argue that the switch to TOU rates is unlikely to increase tenants’ bills, and exemption from the switch to TOU rate structures is not necessary.

It is currently unclear whether or how the switch to TOU rates would affect the bills of tenants participating in the AB 693 program. We agree with TURN that the likelihood that the grid impact of an exemption of participating tenants’ accounts from TOU rates is likely small. At the same time, preliminary information filed in this proceeding³⁴ estimates that very few VNEM customers are likely to be negatively affected by the transition to TOU rates. Given the statutory requirements to provide protection from rate changes we find it reasonable to exempt participating tenants from the requirement applying to other customers using the NEM successor tariff to take service under a TOU rate.

³² Greenlining comments August 3, 2016, at 8.

³³ SCE reply comments August 16, 2017.

³⁴ In response to the Administrative Law Judge's Ruling Requiring Responses to Questions Regarding the Impacts of Time-Of-Use Rates on Virtual Net Metering Customers, issued on August 17, 2017, the utilities predict that some, but not many, customers in the SOMAH program might experience bill increases. There is currently no experience with TOU rates for SOMAH customers against which to test this prediction.

This effectively exempts participating customers from mandatory TOU. When default TOU rates are implemented for residential customers pursuant to D.15-07-001, participating tenants, like other non-NEM residential customers, may choose to opt out of TOU rates.

In contrast, we believe that there is significant value to retaining the requirement that the accounts controlled by the building owner or manager (generally, the account or accounts serving the common areas of participating multifamily properties) remain subject to TOU rate requirements. Participation in SOMAH is not required, and by definition, we expect the common area account(s) to be paid by the property owner or manager that makes the decision to participate in SOMAH. To ensure that the SOMAH program is consistent with our overall NEM policies, we continue the mandatory TOU requirement for *common area accounts* participating in the SOMAH program to encourage property owners to participate in additional energy efficiency, demand response, and other energy management activities.

3.2.3.2. Tenants Must Receive the Full Benefit of VNEM Credits

As further discussed in Section 4, below, our intention is that low-income tenants participating in this program will receive the full economic benefit of the generation allocated to them through the VNEM tariff for the life of the SOMAH system. In order to protect tenants from bearing any additional costs through increased rents, adjustments to utility allowances, or other mechanisms, we direct the PA to establish the appropriate documentation requirements, to be included in their proposed SOMAH Program Handbook, for applicants to demonstrate that 100% of the economic benefits of the generation system will be reserved for tenants through the life of the system. This requirement is similar to

the MASH requirement that the host customer sign an Affidavit Ensuring Economic Tenant Benefit, in addition to the completed VNM Allocation Form, to certify that tenants receive at least 50 percent of the benefits of VNEM credits associated with generation allocated to their accounts. The PA shall collect documentation of this commitment as part of the SOMAH application process.

3.2.3.3. Note on Benefit for Tenants in Federally Subsidized Affordable Housing

One subset of multifamily affordable housing requires additional discussion. As NSC points out in its comments, federally subsidized housing (or housing opportunities, such as vouchers under the federal Project-based Voucher Program³⁵ (a portion of the program that is more commonly known as Section 8)) is governed by federal regulation. In particular, the programs governed by the Multifamily Occupancy Handbook of the (HUD Handbook) sets operational procedures for properties and individual units that receive federal subsidies.³⁶

Although the federal rules are complex, for purposes of implementing AB 693, the key element is that the HUD Handbook places the tenant in a "zero-sum game" with respect to potential bill reductions realized from the SOMAH program.

Pursuant to the HUD Handbook, tenants receiving Project-based Voucher Program benefits must pay 30% of their monthly adjusted gross income for rent and utilities; any reductions in a tenant's payments for utilities would offset some of the utility cost, but the total 30% payment for rent and utilities combined

³⁵ Regulations governing this program are found in 24 CFR Part 982.

³⁶ For a description of program operation and benefits, *see also* https://www.hud.gov/topics/housing_choice_voucher_program_section_8 and <https://www.benefits.gov/benefits/benefit-details/710>.

would not change. For this reason, on-site solar will not reduce total costs for tenant households participating in the Project-based Voucher program. Given this structure, the direct financial benefits of solar PV-generated savings are likely to accrue to the property or result in savings for the federal program, but are unlikely to be experienced by the tenant.

These federal requirements raise serious questions about whether the Commission would be able to "ensure that electrical corporation tariff structures affecting the low-income tenants participating in the program continue to provide a direct economic benefit from the qualifying solar energy system" for federally financed housing arrangements. (Section 2870(g)(2)).³⁷ Federally financed or subsidized housing arrangements that do not allow the tenant the benefit of utility bill reductions are, therefore, not going to be eligible for SOMAH incentives so long as that requirement is in effect. In order to try to extend the benefits of the SOMAH program to the maximum extent feasible, the PA should be authorized to provide incentives to any federally funded arrangements that would allow the tenant to retain the economic benefit of the generation allocated to the tenant, if the housing is otherwise eligible for the program and the project meets all other requirements for receiving incentives.

The PA should also be authorized explore the possibility that HUD may make revisions to its guidelines that would enable wider participation in the program. The PA should not, however, be required to undertake any activities in relation to the HUD guidelines or their application to any particular federally subsidized housing situations.

³⁷ The statutory text addresses the utility tariff structure, but if the tenant does not receive a direct economic benefit, the tariff structure is irrelevant.

3.3. Additional Requirements for Participating Service Providers

3.3.1. Third-Party Ownership Requirements

Consistent with AB 693, when a system subsidized through SOMAH is owned by a third party, further requirements will apply to ensure that no additional costs of system maintenance or operation be passed on to low-income tenants. Specifically, in Section 2870(f)(3), the Legislature directs the Commission to ensure that third-party owned systems installed with SOMAH incentives will perform as projected, and that the economic arrangements will not adversely impact the interests of tenants.

To satisfy this requirement, parties recommended a variety of solutions, ranging from the adoption and use of standard contract language requiring performance guarantees to direct tenant surveys to signed affidavits from property owners attesting that system costs will not be borne by tenants. In the MASH program, a similar guarantee is provided for systems of more than 10 kilowatts (kW) through the use of a Performance Monitoring and Reporting Service, and PG&E suggests using this requirement for the new program.

The PA should develop a form for the property owner to guarantee that costs for a third-party system will not be passed on to tenants. The PA should also develop a method for a performance guarantee (including kWh production) to be provided by the third-party owner to the property owner (and by the property owner to the PA) that will continue throughout the contract term and will provide monetary payment in the case of underproduction.³⁸ For systems sized larger than 10 kW, the third-party owner must contract with a performance

³⁸ See comments of CalSEIA, EFCA, and Everyday Energy.

monitoring and reporting service for at least five years, and ensure that 15-minute interval production data is provided to the PA on a quarterly basis for at least five years.³⁹

Several parties suggest that the SOMAH program should require specific language in the contract between the property owner and the third-party system owner to meet the standards set out in this section.⁴⁰ Putting the PA in the position of crafting language that will work in a wide variety of contractual situations may well involve the PA in disputes over the placement and exact wording of the proposed language. It is likely to be more efficient, and less contentious, for the PA to develop a separate form, and/or a requirement that the contract be annotated to show where the relevant guarantees are set forth. Whatever documentation is chosen must be submitted to the PA in a format that will make verification of compliance as simple as possible. The PA shall propose its recommended form and procedures for complying with these requirements in its Tier 3 Advice Letter on program implementation procedures, as described in Section 6.2.

3.3.2. Providing Economic Development Benefits Through Job Training and Local Hiring

Section 2870(f)(6) requires the Commission to establish local hiring requirements to promote economic development in disadvantaged communities. In compliance with this mandate, we adopt job training requirements similar to those currently in place for MASH contractors. Most parties commenting on AB 693 implementation support implementing this requirement through a job

³⁹ PG&E comments August 3, 2016 at 23.

⁴⁰ These parties include CALSEIA, GRID, ORA, PG&E, SCE, SDG&E, and TURN.

training requirement similar to that provided under MASH, with or without some modifications to the number of participants or training hours to be provided.⁴¹ In contrast, Brightline/SALEF, Greenlining, and the NSC instead recommend requiring contractors to focus on hiring local workers for SOMAH projects, and propose mechanisms such as increased incentive amounts for higher levels of local hiring.

We find that it is reasonable to follow the existing job-training model used in MASH, with some additions. Though we do not adopt specific requirements for the amount of job training to be provided through SOMAH projects, we strongly encourage the chosen PA to develop job training guidelines that emphasize the quality of training for each job training participant, rather than maximizing the number of participants trained. As stated by CalSEIA, “[o]ne individual working a full week gets more experience, has more interactions with the installation team, and gains more transferrable skills, all of which leads to stronger letters of recommendation and potential for future employment.”⁴² We do not at this time adopt specific local hiring requirements, but we direct the PA to develop strategies to encourage local hiring by participating contractors. The chosen PA shall work with Energy Division staff to make a specific proposal on implementation requirements and verification procedures in the PA’s Tier 3 implementation Advice Letter.

⁴¹ See, for example, MASH Coalition Opening Comments at 16, CalSEIA Opening Comments at 18-19, EFCA Opening Comments at 13-14, Everyday Energy Opening Comments at 20-21, GRID Alternatives Opening Comments at 12-18, SCE Opening Comments at 13, SDG&E Opening Comments at 23, and TURN Reply Comments at 8.

⁴² CalSEIA Proposal 8/3/2016 at 18.

In addition, we require the PA to collect and track data on both job training and local hiring provided by solar installers working on projects receiving SOMAH incentives. This tracking must include data on the number of training participants and hours, as well as the amount of local labor, provided by each solar installation contractor working on SOMAH projects. If possible, we encourage the PA to also track data related to the continuing employment of job training participants after their training experience. Such data may assist the Commission in developing more effective job training and local hiring requirements after the 2020 SOMAH program review, to increase the economic benefits experienced in communities served by the SOMAH program.

3.3.3. Energy Efficiency Services and Coordination with Other Clean Energy Programs

In accordance with Section 2870 (f)(7), we require that properties served under the SOMAH program be provided with energy efficiency services at least equal to those applicable in the current MASH program. This includes undergoing energy efficiency audits and notifying tenants about the availability of the IOUs' Energy Savings Assistance (ESA) Program. In addition, we require participating property owners or host customers to receive information about and contact information for the serving utility's ESA multifamily single point of contact adopted in D.16-11-022.⁴³

Though the PA will not be providing direct installation services to participating properties, it will be providing technical assistance to participating contractors and service providers. In this capacity, we encourage the PA to develop innovative ways to increase the energy efficiency services delivered

⁴³ D.16-11-022, Ordering Paragraph 45.

under this program. Also, in order to maximize the effectiveness of services provided under this program, the PA will develop and propose methods to coordinate with other clean energy programs in order to ensure that properties receiving SOMAH incentives are aware of and can access other sources of services and funding for which they may be eligible.

The PA must demonstrate strong experience in providing consulting services in the fields of large multifamily improvement, renovation or equivalent residential or commercial construction activity, with a focus on weatherization, energy efficiency, and photovoltaic standards. In an effort to provide a true single-point-of-contact, we expect that the PA will have a solid understanding of the decision-making, finance capitalization, and ownership profiles characteristic of multifamily properties with HUD, California Housing Finance Agency, or Low Income Housing Tax Credit covenants that meet the requirements in Section 3.1.1., above. We also expect the PA to have successfully participated in multifamily residential renovations and upgrades or energy retrofit programs that were supported by multiple public and/or private funding sources.

3.4. Applicability of Additional MASH Program Requirements

In addition to the program elements specified in detail in this decision, we find that certain relatively uncontroversial MASH program rules should be applied to the SOMAH program. Parties generally agree that these foundational requirements provide valuable safeguards to protect customers and ensure the integrity of the program. We agree, and so we require the PA to propose requirements in the following areas modeled on the corresponding MASH requirements. Because these rules will be based on existing MASH policies and

are relatively uncontroversial, they need not be described in detail in this decision. The MASH requirements that we adopt for SOMAH are:

- 1) Contractors State Licensing Board (CSLB): All contractors receiving SOMAH incentives must have a CSLB license to participate in the program.
- 2) Warranty: Systems installed using SOMAH incentives must have a minimum 10-year warranty, to protect against defects and undue degradation.
- 3) Performance/Permanency: Systems installed using SOMAH incentives must be secured to a surface and remain in place for the duration of the system's useful life. This means that systems, once installed, may not be removed during their useful life, and portable systems may not receive incentives through SOMAH.
- 4) Interconnection with the Utility Distribution System: Systems installed using SOMAH incentives must interconnect with the local electric utility distribution system.
- 5) Energy Production Metering: Systems installed using SOMAH incentives must install the appropriate metering equipment to fit their system.
- 6) Inspection: The PA retains the right to perform an onsite system inspection to verify documented system information and specifications and ensure system meets SOMAH requirements.
- 7) Equipment Eligibility: Systems installed using SOMAH incentives must meet the standards set forth by Title 20, California Code of Regulations for renewable generation.
- 8) 18-Month Reservation Period: Installation of projects awarded SOMAH incentives must be completed within 18 months approval of participation.
- 9) Payment Designation: Payment of SOMAH incentives may be paid either to the host customer (property owner/manager) or to a third party (generally the installer) if so indicated on the claim form.

- 10) Equipment Must Serve On-Site Electrical Load: Systems installed using SOMAH incentives must be located on the property served by and receiving the bill benefits from the equipment, and must be sized to serve on-site load.

To facilitate SOMAH implementation, these rules should be modeled on the appropriate sections of the MASH Handbook, and should be included in the comprehensive SOMAH Handbook submitted with the PA's Tier 3 implementation advice letter.

3.5. SOMAH Program Budget and Funding

3.5.1. Funding Calculations

The statute provides a specific funding mechanism for the program in Section 2870(c), which states:

The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or 66.67 percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5. . .

The quoted provision is the current one, added by SB 92, which clarifies the funding calculation described in the original enactment of AB 693.⁴⁴ The revenues described in Section 748.5 are the proceeds from the sale of greenhouse gas (GHG) allowances allocated to California's investor-owned electric utilities for the benefit of their ratepayers. Section 748.5(c) reserves up to 15% of those proceeds for use in clean energy and energy efficiency projects, with the remaining proceeds returned to customers. Section 2870 allocates a portion of the GHG allowance proceeds reserved for clean energy and energy efficiency

⁴⁴ As originally enacted, AB 693 provided for annual authorization of "one hundred million dollars (\$100,000,000) or 10% of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5. . . (Section 2870(c).)

projects to the SOMAH program. The current language of AB 2870 means that the annual authorization will be the lesser of:

- \$100,000,000 or
- $66.67 * 0.15 * (\text{IOUs' proceeds from allocated GHG allowances})$.

The second number is more easily expressed as "10% of the IOUs' greenhouse gas allowance proceeds."

Prior to the enactment of SB 92, the amount of funding for SOMAH had been the subject of some uncertainty. Although the cap of \$100,000,000 was clear, the alternative (a proportion of the GHG allowance proceeds allocated to the IOUs by Section 748.5(c)) was less so. The IOUs argued that the alternative amount should be calculated as 10% of the IOUs' GHG allowance proceeds identified in Section 748.5(c), which constitute 15% of the IOUs' total proceeds. Other parties urged that the statute should be read as mandating that 10% of the proceeds from the sale of the IOUs' total GHG allowances (or \$100,000,000, whichever is less) were available annually for the SOMAH program.⁴⁵ SB 92 has resolved any possible ambiguity in the calculation method, obviating the need to consider the parties' prior arguments in this decision.

The results of the five most recent quarterly auctions of the three large electric IOUs' GHG allowances, as publicly provided by the Air Resources Board, are given in Table 1, below.

⁴⁵ Compare comments of PG&E, SCE, and SDG&E with reply comments of CALSEIA, CSE, Everyday Energy, Greenlining, and NSC.

Table 1

CALIFORNIA CAP-AND-TRADE PROGRAM
SUMMARY OF PROCEEDS TO INVESTOR OWNED UTILITIES
(as of September 2017)⁴⁶

Auction Quarter or Fiscal Year	Proceeds to Investor Owned Utilities (IOUs)	15% of Proceeds to IOUs for Clean Energy Programs	Amounts available for AB 693 (2/3 of 15% of Proceeds to IOUs for Clean Energy Programs)
Q3 2017 (August)	\$271,091,076.00	\$40,663,661.40	\$26,838,016.52
Q2 2017 (May)	\$385,649,721.60	\$57,847,458.24	\$38,584,254.65
Q1 2017 (February)	\$119,586,235.65	\$17,937,935.35	\$11,964,602.88
Q4 2016 (November)	\$402,293,345.43	\$60,344,001.81	\$40,249,449.21
Q3 2016 (August)	\$244,458,798.26	\$36,668,819.74	\$24,458,102.77
FY 2016-2017 Total to Date	\$1,423,079,176.94	\$213,461,876.54	\$142,094,426.03

These quarterly results vary by almost a factor of four between the highest and lowest amounts.

⁴⁶ Table adapted from the California Air Resources Board table "California Cap-and-Trade Program Summary of Proceeds to California and Consigning Entities" available at: https://www.arb.ca.gov/cc/capandtrade/auction/proceeds_summary.pdf ARB main page with Quarterly Auction results available at: <https://www.arb.ca.gov/cc/capandtrade/auction/auction.htm>. Table does not include results for Liberty and PacifiCorp.

The variation among quarterly auction results is relevant to the program in two related ways. First, and most obvious, the amount of money available for each program year is determined by the amount of the IOUs' GHG allowance proceeds. If, as shown for 2016-2017, that amount is \$100,000,000 or more, the amount available for AB 693 program use is the maximum of \$100,000,000, and the variability of the auction proceeds no longer matters. If, however, the funds from the auction of the IOUs' GHG allowances in any year are less than \$100,000,000, then the uncertainty of the program funding comes into play. Much of the variability in the 2016 and early 2017 auction results may have been due to uncertainty about the continuation of the GHG mechanism, which has now been resolved with the authorization of the program through 2030. Nevertheless, program budgeting methods must account for the possibility that program funding is less than \$100,000,000 at some point in the future. Because of this, in its Tier 3 implementation Advice Letter, the PA should propose a method of budgeting for the program that will take into account the variability of the funds available from the GHG allowance auctions, when that variability leads to amounts of less than \$100,000,000 annually being available for the program.

The second issue, derived directly from the first, is the size of the administrative budget for the program. The statute provides that "not more than 10% of the funds allocated to the program shall be used for administration." (Section 2870(e).) This directive puts a ceiling of \$10 million annually on administrative costs in program years in which \$100,000,000 is available; in the event that the auction proceeds are lower, the allowable amount for administrative costs will vary with the amount of money available for the program. The costs of administration for a statewide program are likely to be more or less uniform from year to year (with the probable exception of the

start-up year), even if the available funds are not. The PA should use a ceiling of \$10 million for administrative costs⁴⁷ when proposing a program budget in the Advice Letter described in Section 6.2.⁴⁸

3.5.2. IOUs' Funding Contributions and Accounting

The statute directs funding allocation for SOMAH beginning with the fiscal year 2016-2017 (beginning July 1, 2016). In order to begin accounting for any funds that would be allocated, the Administrative Law Judge's Ruling (1) Adding Respondents and (2) Providing Interim Direction to California Electric Utilities on Accounting for Funds for Implementation of Assembly Bill (AB) 693 (March 18, 2016) (March Ruling) directed the electric IOUs to allocate a portion of their 2016 and 2017 GHG allowance proceeds to fund the AB 693 Multifamily Program. For 2018 and beyond, the ruling states (at 5) that "the directions for ERRR and ECAC filings given in this ruling will continue to apply unless they are explicitly changed by a subsequent ruling or Commission decision."

In their subsequent ERRR applications, PG&E set aside \$6.8 million in both 2016 and 2017;⁴⁹ SCE set aside \$3.04 million in 2016 and \$5.04 million in

⁴⁷ The SOMAH program administrative budget, capped at \$10 million per year, includes funding for all PA and program evaluation, measurement, and verification activities (EM&V), as well as internal utility administrative activities directly attributable to the program as discussed in Sections 7, 8, and 9 below, and the amounts designated in this decision to support Energy Division oversight of the program.

⁴⁸ This estimation formula cannot and does not supersede the statutory ceiling of 10% of available funds for administrative costs. If, for example, in one program year the available amount of GHG allowance auction proceeds is \$40,000,000, the administrative costs for the program cannot exceed \$4,000,000.

⁴⁹ See page 13-3 of PG&E's *Prepared Testimony -2018 Energy Resource Recovery Account And Generation Non-Bypassable Charges Forecast And Greenhouse Gas Forecast Revenue Return And Reconciliation*.

2017;⁵⁰ and SDG&E allocated \$630,910 in 2016 and \$1.31 million in 2017.⁵¹ These amounts are significantly lower than the amounts as calculated pursuant to SB 92. This is a lingering effect of the ambiguity in the original funding formula; the IOUs set aside 10% of the amounts provided in Section 748.5(c), rather than 10% of their total proceeds from the GHG allowance sales. These amounts, which were adopted in the companies' respective ERRA forecast proceedings (or Energy Cost Adjustment Clause (ECAC) applications, which serve a similar function to ERRA for Liberty and PacifiCorp), have already been adopted by the Commission, and cannot be changed in this decision. The funding amounts for those years may be revisited in future ERRA or ECAC true-ups, if appropriate. Going forward, beginning with the updates to their 2018 ERRA forecasts, the IOUs must identify in their ERRA or ECAC filings an amount of money for funding the SOMAH program that is based on the calculation requirements of SB 92, and is consistent with realistic expectations of available revenue.

In their comments, several parties proposed that each IOU should reserve 10% of its total GHG allowance proceeds.⁵² Given that the IOUs already estimate their annual GHG allowance proceeds as part of their ERRA (or for Liberty and PacifiCorp, ECAC) applications, there is no need to develop a new methodology for estimating those proceeds. We find that it is reasonable for each IOU to

50

[http://www3.sce.com/sscc/law/dis/dbattach5e.nsf/0/A3213945BB0BCC44882581140002EED3/\\$FILE/A1705XXX%20SCE-1%202018%20ERRA%20Forecast%20Testimony.pdf](http://www3.sce.com/sscc/law/dis/dbattach5e.nsf/0/A3213945BB0BCC44882581140002EED3/$FILE/A1705XXX%20SCE-1%202018%20ERRA%20Forecast%20Testimony.pdf) (at 74-75).

51

https://www.sdge.com/sites/default/files/regulatory/PUBLIC_Montoya_Testimony_Redacted.pdf (at BAM-25).

⁵² They include EFCA, Greenling, MASH Coalition, NSC, and PG&E.

reserve the full 10% of its allowance proceeds as part of its ERRA (or for Liberty and PacifiCorp, ECAC) applications, updating those estimates if appropriate during the proceeding.

However, when the actual funding allocation is made, if the IOUs' reservations add up to more than \$100 million, each IOU shall contribute only its proportionate share of \$100,000,000, and not more. This share for each IOU should be based on the fraction of total GHG allowance sale proceeds for the four quarters that its allowance sale proceeds represent. For example:

Table 2⁵³

IOU	IOU's proceeds	Proportion of total proceeds	Share of \$100 million
PG&E	\$500,000,000	45.5%	\$45,500,000
SCE	\$450,000,000	40.9%	\$40,900,000
SDG&E	\$150,000,000	13.6%	\$13,600,000
Totals	1,100,000,000	100%	\$100,000,000

In order to provide the simplest transition from the prior funding reservations to the clear requirements of SB 92, the funds previously reserved by the IOUs should be rolled into the 2017-2018 program year budget proposed by the Program Administrator, in addition to the current funding for that year. Similarly, uncommitted funds can be carried over from one year to the next for the duration of the program. In its Tier 3 program implementation Advice

⁵³ This example adapts an example presented by PG&E. This example, which does not include Liberty and PacifiCorp, does not represent, and should not be taken to represent, any actual or predicted GHG allowance auction results.

Letter, the Program Administrator will propose procedures to ensure that money spent on project incentives in a particular IOU's service territory does not exceed the funding provided by that utility over the life of the program.

3.5.3. IOU Accounting

As suggested by PG&E and SCE, each IOU should set up an AB 693 balancing account to track its authorized funding for SOMAH. These accounts should track all costs associated with the SOMAH program, including the initial costs of fielding an RFP, as well as the costs of utility administrative activities (including but not limited to reporting), contributions to PA administrative budgets, and incentive payments. Unencumbered funds at the end of a program year should be carried over to future years. It is premature to decide how any funds that have not been spent by the end of the program should be treated. The treatment of such funds, if any, should be the subject of a Tier 3 Advice Letter submitted by the utilities, or of a Commission decision, once the duration of the SOMAH program and the extent of funds used in it are more clearly known. The IOUs should file Tier 1 Advice Letters creating SOMAH balancing accounts and describing the operation of those accounts within 60 days of the date of this decision.

3.5.4. Allocation of Funding Between DAC and Low-Income Tenant Qualification Paths

AB 693 provides two criteria for eligibility: location of the housing in a disadvantaged community; or tenants meeting the identified income criteria. (See Section 3.1.1., above.) The statute provides no indication of whether, and if so, how, the Commission should make a specific allocation of incentives between properties meeting each of the criteria. In the March Ruling, the ALJ asked for

comment on whether specific allocations between the two groupings should be made.

Greenlining, NSC, and Custom Power Solar assert that the distinction between the two groupings of eligible housing is significant in meeting the program's purposes. They argue that the PA should take these groupings into account in making funding allocations. CSE supports the concept of allocation of incentives according to these groupings, though it makes a different proposal for how to make the allocation. All of these commenters assert that the PA should also retain some discretion over the allocations.

Most parties oppose the idea of a program budget with a firm split between low-income qualification and qualification by virtue of location in a disadvantaged community.⁵⁴ Many commenting parties point out the administrative complexity that would be introduced by splitting the incentive budget. ORA suggests that, in order to be effective, a split budget should be based on a reasonably accurate forecast of demand in each category, which is unlikely to be feasible at the outset of the program.⁵⁵

As TURN notes, it is important for the program to have sufficient flexibility in its early stages to be successful. It is also important to limit administrative complexity, especially for a program with a budget that could vary from year to year. Therefore, the program should not begin with a fixed allocation of funds between the two categories of eligibility, even if the PA were

⁵⁴ These include CalSEIA, EFCA, Everyday Energy, GRID, MASH Coalition, ORA, PG&E, SCE, SDG&E, and TURN.

⁵⁵ This difficulty would be compounded by the fact, noted by EFCA, Mash Coalition, SCE, and ORA, that many properties may be eligible through both categories.

to have some discretion over the division of incentives between the two categories. As CalSEIA and TURN point out, the 2020 evaluation can be used to identify whether particular customer groups have been underserved, and to devise steps to remedy any imbalances in the provision of incentives.

In order to promote informed consideration of this issue in the 2020 evaluation, the PA should, as part of its regular reporting on the program, identify the amount of incentives awarded to each eligibility grouping annually.

4. Incentive Structure

AB 693 directs that:

The commission shall ensure that incentive levels for photovoltaic installations receiving incentives through the program are aligned with the installation costs for solar energy systems in affordable housing markets and take account of federal investment tax credits and contributions from other sources to the extent feasible.

(Section 2870(f)(4).)

The statute sets two elements that the Commission must take into account: "installation costs for solar energy systems in affordable housing markets," and "federal investment tax credits and contributions from other sources to the extent feasible."

Most parties are in agreement that solar system installation costs in affordable housing markets are not publicly known.⁵⁶ This is due principally to the absence of affordable housing markets for solar installations beyond the incentives provided by the MASH program. Indeed, strengthening that nascent market is a large part of the purpose of AB 693.

⁵⁶ See, for example, Everyday Energy Comments, August 3, 2017 at 10-13; Grid Alternatives Comments, August 3, 2017 at 9.

In the absence of available market data, several parties propose using benchmarked installation costs as the basis of incentives. PG&E and others suggest several sources of cost data for possible use in determining appropriate incentive amounts. PG&E and others, for example, refer to the National Renewable Energy Laboratory (NREL),⁵⁷ noting that NREL's 2015 report of price and cost breakdowns for the first quarter of 2015 shows a "Commercial scale 200 kW solar PV project has an all-in price of \$2.15/Watt."^{58, 59} NSC similarly cites NREL as a benchmarking data source, and also suggests LBNL's "Tracking the Sun" report⁶⁰ as another possible data source.

Despite the relative lack of information on solar PV costs associated specifically with affordable housing developments, parties propose a range of incentive levels and structures for the calculation of incentives. For example, parties suggest that the incentive level could vary based on a number of factors, including: whether the project is funded with additional incentive sources or tax credits, whether the load being funded will be allocated to the tenant or to the common area of a property, and the size of the system being installed. Incentive level recommendations range from under \$1/W to more than \$3.50/W. Most

⁵⁷ <https://www.nrel.gov/docs/fy15osti/64746.pdf>.

⁵⁸ Though some parties such as CalSEIA, Greenlining, and NSC propose basing the incentive amount on the direct current (DC) capacity of the system, with the incentive calculated as dollars per DC Watt (\$/DC-W), we will remain consistent with past practice in the CSI and MASH programs and calculate the incentive amount using the alternating current capacity of the system, which is somewhat lower than the DC capacity due to losses in the conversion process.

⁵⁹ PG&E comments submitted on August 3, 2017, at 9.

⁶⁰ See, most recently, Tracking the Sun 10, issued September 2017 <https://emp.lbl.gov/publications/tracking-sun-10-installed-price/>.

parties agree that incentive levels should be higher for the portions of a system meant to serve tenant load than the portion to serve common area load.

In order to ensure that tenants gain the full benefit for energy generated by the load allocated for their use, we find that it is reasonable for the program to cover the full cost of tenant load. At the same time, as provided in Section 2870(f)(5), the incentive payment cannot exceed the full cost of the system capacity. Several parties estimate an average per Watt cost of between \$3.20 and \$3.50 per Watt,⁶¹ and we agree with parties that amount provides a reasonable estimate of average project costs. On this basis, we are adopting a base incentive of \$3.20 per alternating current (AC) Watt for tenant load. In order to meet the requirement of AB 693 that our incentive levels take into account the availability of other incentives and credits, we adopt an incentive structure that reduces the incentive level by 30% if the project receives either the Investment Tax Credit (ITC) or the Low Income Housing Tax Credit (LIHTC), and 50% if the project receives both benefits. This incentive structure is shown in Table 3, below. At the same time, as provided in Section 2870(f)(5), the incentive payment cannot exceed the full cost of the system.

We also agree with parties that the incentive for the portions of system load intended for tenants should be larger than the incentive for the portion allocated to common areas. Incentives for common areas should be enough to encourage installation of solar PV systems, while still ensuring that the property owner has sufficient investment in the project to motivate further actions to

⁶¹ PG&E comments at 8-9 state \$3.56 is the MASH reported cost; NSC estimates \$3.20 based on its review of recent NREL and LBNL reports, and Everyday Energy estimates an average cost of \$3.25 to \$3.50 per Watt, Everyday Energy Comments at 12. See, NSC Comments at 52.

capture ongoing energy savings, for example through energy efficiency efforts. As a result, we adopt a base incentive of \$1.10 per AC Watt for common areas served by SOMAH projects. As with the tenant incentives, this base amount will be discounted for projects that also receive ITC or LIHTC benefits (see Table 3). The program's incentive structure provides fixed, up front, capacity-based incentives for qualifying solar energy systems, using the Expected Performance Based Buydown methodology adopted in D.06-08-028.

Table 3

TAX CREDITS		\$ per AC Watt INCENTIVE	
ITC	LIHTC	Tenant	Common Area
No	No	\$ 3.20	\$ 1.10
Yes	No	\$ 2.25	\$ 0.80
No	Yes	\$ 2.25	\$ 0.80
Yes	Yes	\$ 1.60	\$ 0.60

Several parties recommend that the Commission conduct or oversee a market study to improve the accuracy of cost data for this market, in an effort to set incentive rates that are more reflective of market costs. In order to expedite the implementation of this program, we decline to require such a study. Such a study is likely to be time-consuming and expensive, and given the limited nature of the market to be studied, we believe that the usefulness of any such effort would be limited by the likely small sample size included in the study. The time and expense of a study is not warranted at this time.

The incentives adopted here will be re-evaluated when additional information on the costs of installation for multifamily affordable housing become available, most likely during the program evaluation scheduled for 2020.

We expect that review to be informed by data collected by the PA and others on the projects developed through the SOMAH program.

Though we do not adopt incentives for the installation of on-site energy storage systems as part of the SOMAH program, nothing in this decision precludes a developer from pairing a solar generation system that receives SOMAH incentives with storage, to the extent that paired storage is allowed under applicable tariffs.

4.1. Incentive Step-Down

Similarly, we decline to require a specific study to facilitate the adjustment of project incentives in future years. Multiple parties recommended the use of some type of pre-determined methodology for calculating an annual step-down in incentives,⁶² and we find this to be a reasonable and efficient option. Under the structure adopted here, incentive levels will decrease by the annual percent decline in residential solar costs as reflected by NREL reports, or 5% annually, whichever is less. Both NSC and the Greenlining Institute recommend this or a similar approach, and we find that this calculation method will ensure that annual incentive reductions reflect changes to actual market costs, while not declining too much in any given year. This incentive step-down methodology will be reviewed and may be changed in the 2020 program evaluation, if appropriate based on further cost or market information.

⁶² For example, PG&E (Comments at 7), and SDG&E (Comments at 5) recommend an annual decrease of 10%, and the MASH collation recommends a reduction of \$0.10 per year (MASH Coalition Comments at 2 and 6).

5. Program Administration

AB 693 does not provide specific guidance on the administration of the SOMAH program. The July 2016 Ruling Seeking Proposals asked parties to comment on an appropriate administrative structure for the program and the activities that should be required of the PA. This section discusses the administrative structure for the program as a whole, and outlines the major activities for which the PA will be responsible.

5.1. Administrative Structure

The record provides for two main options for the overall administration of the SOMAH program. On this issue, parties were split between those who advocate for a single, statewide PA, and those who support separate PAs in the service territory of each participating utility. In addition, CCA representatives recommend that the CCAs be made PAs in certain areas.

CalSEIA, CSE, Greenlining, GRID Alternatives, NSC, ORA, and TURN recommend the use of a single PA, asserting that this structure would increase the efficiency and cost-effectiveness of the program by avoiding the need to create multiple administrative entities.⁶³ Other potential benefits of this administrative structure include reducing costs and confusion among program participants by providing a single point of contact, especially for participants with projects in multiple service territories, and ensuring consistency across territories in policies and program administration. The administrative structure would also facilitate the participation of PacifiCorp and Liberty Utilities, who

⁶³ See, for example, CalSEIA Opening Comments at 24-25, CSE Opening Comments at 18-20, Greenlining Opening Comments at 10-11, GRID Opening Comments at 20-22, NSC Opening Comments at 89-93, ORA - 15-16, and TURN Opening Comments at 19-21.

assert that it would be inefficient for them to set up separate administrative structures for AB 693-related activities in their relatively small and sparsely populated California service territories.⁶⁴

In contrast, the three large IOUs, along with EFCA, Everyday Energy, and the MASH Coalition, advocate for separate PAs in the different utilities' service territories. These parties propose retaining an administrative structure similar to that used in the current MASH program, with the exception of SDG&E, which recommends that it administer the program in its own service territory, rather than contracting with CSE or another entity to manage their program, as is the case for MASH.⁶⁵ These parties cite experience with the MASH program, which SCE, PG&E, and CSE (for SDG&E) have managed separately in each service territory for almost a decade.

Specifically, these parties argue that the current MASH administrators have the most experience running this type of program, and assert that the MASH program has had high levels of participation and reasonable administrative costs under its current administrative structure. PG&E also suggests that managing the new program at the utility service territory level would simplify tracking of the funding and expenditures and ensure that funds attributable to each company would be used within that company's territory.⁶⁶ In addition, advocates of the multiple-administrator model argue that this approach could simplify coordination between this new program and the

⁶⁴ Liberty Opening Comments at 3-4, PacifiCorp Opening Comments at 4-5.

⁶⁵ EFCA Opening Comments at 17, Everyday Energy Opening Comments at 28-32, MASH Coalition Opening Comments at 20, SDG&E Opening Comments at 27-28.

⁶⁶ See, for example, PG&E Opening Comments at 27-29.

utilities' low-income and distributed energy resources programs, including their energy efficiency activities. Parties also suggest that a non-utility administrator would not be subject to full Commission oversight. Parties also argue that use of a single PA will delay the implementation of the program until a PA is chosen, presumably through a Request for Proposal process.⁶⁷

The Commission has experience with both of the administration models proposed by parties to this proceeding. For example, the MASH program currently operates using separate PAs in each utility service territory, whereas the SASH program uses a single PA to oversee services statewide. As suggested by CSE and TURN,⁶⁸ our experience demonstrates that non-utility PAs can successfully manage programs across different utility service territories, while keeping administrative costs comparable to, or even lower than, separate administration by the IOUs.

Though the SOMAH program shares some goals and features with the existing MASH program, it is in fact a new program, and will require the development of new rules, procedures, and administrative structures. As a result, we are persuaded that the efficiencies we might gain from replicating the MASH administrative structures for SOMAH are minimal, given expected differences between the two programs. These potential efficiency gains would be further eroded by substituting SDG&E for CSE as PA in the SDG&E territory, or authorizing the CCAs to manage the program for their customers. Either of these options would require the development of new program management

⁶⁷ PG&E Opening Comments at 29, EFCA Opening Comments at 17, Everyday Opening Comments at 30, MASH Coalition Opening Comments at 18, SCE Opening Comments at 19.

⁶⁸ CSE Opening Comments at 19, TURN Opening Comments at 19.

structures at the service-territory level, rather than relying on existing management structures.

In addition, even if the several administering entities were to coordinate in development of specific rules and procedures for the operation of the program, for example through development of a handbook along the lines of the existing MASH Handbook, this diffuse structure is likely to lead to duplication of efforts in areas such as outreach, screening of applicant eligibility, and processing of incentive payments, potentially creating inefficiencies. As noted in the most recent evaluation of the MASH and SASH programs, one concern expressed by MASH participants is the lack of a single point of contact to provide consistent direction and continuity in services to potential projects.⁶⁹ Similarly, allowing multiple administrators to manage the program will complicate efforts to provide consistency in program activities throughout the state.

In contrast, a single statewide PA will also be able to coordinate marketing and education efforts, ensuring consistent messaging to and treatment of potential participants. Such a structure should simplify communication about the program and make it more accessible to participants. For these reasons, we choose to have a single PA oversee this program statewide.

⁶⁹ The Navigant SASH/MASH 2011-2013 Market and Program Administration Assessment (accessible at <http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=9322>) found, based on installer feedback, that among the most significant MASH program barriers were a lack of communication about MASH program status, lack of clarity regarding the primary point of contact at each PA and PA organizational structure. (At XVIII and 17.) Similarly, some property owners mentioned having difficulty understanding program and regulatory requirements, which may indicate that better, more targeted outreach, would be helpful. (At 62, 87). In addition, several installers commented that having one statewide PA entity would reduce communication issues and ensure consistency in implementation.

5.2. Participation of Liberty and PacifiCorp

In response to the July 8, 2016 request for comments, two of the small and multi-jurisdictional utilities in the state, Liberty and PacifiCorp, ask to be exempted from any program implementing AB 693. Both companies argue that given their limited and relatively remote service territories, they are unlikely to have many (or any) customers eligible for a program under AB 693. Both companies ask to be exempt both from providing AB 693 services and from contributing a portion of their GHG allowance proceeds to the program. Nearly all other parties argue that the intention of AB 693 is to create a program that will benefit low-income residents throughout the state, and suggest that Liberty and PacifiCorp should participate.

Liberty and PacifiCorp assert that they are unlikely to have many eligible properties in their service territories; Liberty expects to have no more than a “negligible” number, if any. PacifiCorp notes that it has been exempt from the CSI and MASH programs that similarly promote adoption of on-site solar PV generation. PacifiCorp in particular argues that, given its geographically dispersed territory and small number of customers, it would be inefficient and overly burdensome for PacifiCorp to administer an incentive program in its service territory. Further, in comments on the proposed decision in this matter, PacifiCorp and Liberty both assert that because neither company has a VNEM tariff, by definition, none of their customers can meet the requirement that “[participants’ u]nits must be separately metered and eligible for a virtual NEM (VNEM) tariff.”

It is true that the MASH and CSI programs were not implemented in the Liberty and PacifiCorp service territories, and these companies have not previously been required to offer a VNEM tariff. Unlike MASH, which, as part

of CSI, was not funded for the small and multi-jurisdictional utilities, SOMAH is supported by a discrete funding source, GHG allowance proceeds, that is available to all five of the electric utilities discussed in this decision, and the program is specifically targeted to low-income residents and residents of disadvantaged communities. PacifiCorp acknowledges in comments that “nearly half of [its] customers qualify for low-income bill assistance,”⁷⁰ which is a much higher percentage than in the large IOUs’ territories, but asserts that it believes that few properties in its territory would meet the requirements that for AB 693 incentives. We agree with the Greenlining Institute that Liberty and PacifiCorp should only be exempted from the program if they can show that they have no eligible properties in their service territories. Based on information currently available to Energy Division staff, both Liberty and PacifiCorp have properties in their service territories that receive the LIHTC or USDA Rural Development Multifamily funding, and therefore are likely to meet the eligibility requirements for SOMAH if given access to a VNEM tariff. The companies’ current lack of VNEM tariffs is addressed by Section 3.2.1. above, which orders participating utilities “to file a Tier 1 advice letter designating a VNEM tariff for use by SOMAH participants within 90 days of the issuance of this decision.” We encourage Liberty and PacifiCorp to model their new VNEM tariffs on the larger utilities’ VNEM tariffs, with the modifications required in this decision.

Given this, and in order to ensure consistent operation throughout the service territories of the IOUs, it is reasonable to require Liberty and PacifiCorp to participate in the SOMAH program, both by providing funding from their

⁷⁰ PacifiCorp Opening Comments at 2.

GHG allowances and making the program available to their customers. We find that the administrative structure we adopt for this program, utilizing a single, state-wide PA, will ameliorate the administrative burden on the small utilities and allow for efficient operation of the program throughout the state.

PacifiCorp's concerns about its lack of access to information on deed restrictions or other qualifying arrangements⁷¹ should be adequately addressed by having a third-party administrator set up and implement a process for eligibility verification, so the burden will not fall on the small utilities. For these reasons, we do not exempt Liberty and PacifiCorp from this program, and we order each to provide a portion of GHG allowances to fund the program and to cooperate with the third-party administrator. As discussed in Section 3.4.2., above, Liberty and PacifiCorp shall reserve the required amount of GHG allowance proceeds in their current and future ECAC applications.

5.3. Major Responsibilities of the Program Administrator

This section enumerates the PA's major activities and responsibilities, consistent with the program operation and eligibility requirements established in this decision.

In general, the PA will be responsible for ensuring that all participants in SOMAH, including applicants approved to receive services and contractors that provide those services, meet all program requirements. Toward this end, the PA will establish and then implement a process for documenting the eligibility of all program applicants. In addition, the PA will develop processes for verifying the quality and completeness of work performed by participating contractors and for

⁷¹ PacifiCorp Opening Comments at 4-5.

ensuring proper payment of program incentives. Specifically, the PA shall be responsible for the development and management of the program, including but not limited to the following activities.

- 1) Development of **program materials and procedures**, including:
 - a. digital application forms and procedures;
 - b. eligibility documentation requirements;
 - c. data collection methods, digital forms, and databases;
 - d. outreach materials (in coordination with statewide education and outreach efforts, as described in D.16-03-029 and D.16-09-020);
 - e. incentive payment procedures, including safeguards to ensure that incentives paid for projects in a particular IOU's service territory do not exceed the funding received from that IOU over the life of the program; and
 - f. a SOMAH program Handbook, which we anticipate will contain information comparable to the current MASH Handbook.
- 2) General **program management**, including:
 - a. Supporting the Commission's Energy Division throughout the SOMAH program, including assisting with reports, public comment process, meetings, workshops, and evaluation activities and other activities as specified in its contract.
 - b. Reviewing applications and making eligibility determinations, including collection of documentation of property and participant eligibility, and compliance with proposed projects with program rules;
 - c. Providing technical assistance with the application processes;
 - d. Collecting and facilitating access to program resources, including but not limited to a list of qualified agencies providing assistance to affordable housing, a list of qualified

job training organizations, and energy efficiency information and best practices;

- e. overseeing contractor compliance with program requirements (for example, ensuring that job training, energy efficiency, and other requirements are met); and
- f. processing incentive claims.

3) **Data Collection and Reporting** on program operation and outcomes, such as:

- a. collection of data on program operations, including but not limited to applicants' eligibility information, project proposals, tracking of project status, contractor compliance, and incentives paid;
- b. collection and reporting of data on the number of training participants and hours, as well as the amount of local labor, provided by each solar installation contractor working on SOMAH projects;
- c. tracking of progress towards the AB 693 MW development target; and
- d. collection of information on tenant costs and benefits; and meeting all reporting requirements developed by the Commission's Energy Division staff, including posting data on <http://californiadgstats.ca.gov/>.

5.4. The Installation of SOMAH Projects by the Project Administrator

As noted by several parties in their comments on the proposed decision, allowing the PA to provide services under the program could raise conflict of interest concerns. Because of this, if a potential PA proposes to do installation work in SOMAH in addition to administering the program, the potential PA must disclose any possible conflicts of interest in its response to the Request For Proposal, and must propose safeguards to ensure its participation as both PA and installer does not interfere with competition in the installation market.

6. Implementation Plan and Next Steps**6.1. Selection of a Program Administrator**

Based on our determination that SOMAH should have a single state-wide PA, we find that selection of a PA should be made through a competitive bidding process. Specifically, the Commission's Energy Division will select the Program Administrator through an RFP process managed by SCE on behalf of the Commission. The RFP process shall be led by staff from the Commission's Energy Division, and Energy Division will make the final decision on the winning bidder and will select one utility to contract with the winning bidder. In making this determination, Energy Division shall take into consideration the following factors recommended by parties in this proceeding:

- 1) Experience with service delivery in a similar program(s) - by directly or through partners or subcontractor(s), delivering services for engineering, designing, procuring, installing, testing and commissioning of PV systems in multifamily buildings.
- 2) Databases and IT - Demonstrated successful management of federal, state, and/or local funds; with the ability to track and comply with specific programmatic and audit requirements of multiple funding sources. Maintain a system of internal accounting and administrative control; demonstrate a history of fiscal stability and responsibility.
- 3) Workforce development and tracking - Experience documenting and reporting workforce participation goals with a track record of providing training in solar installation procedures. Training experience could include training outside entities, formal in-house training, or developing training curricula and may include knowledge of, and demonstrated coordination with, existing utility and other statewide workforce, education, and training programs and pathways.
- 4) Technical assistance - Experience in decision-making, finance capitalization, and ownership profiles characteristic of multifamily properties with HUD, CalHFA, or LIHTC covenants

and has provided consulting services in the fields of large multifamily improvement, renovation or equivalent residential or commercial construction activity, with a focus on weatherization, energy efficiency, and photovoltaic standards.

- 5) Application review and eligibility verification.
- 6) Data Reporting.⁷²

We direct Southern California Edison to support the selection of a statewide administrator through an RFP process selection and manage the RFP process on the Commission's behalf to assist in expediting the process. Commission staff will play a central role in developing the RFP and will make the final decision on the winning bidder. The RFP process will be concluded and SCE will sign a contract with the chosen PA by April 30, 2018, unless a different date is determined through a letter from the Commission's Energy Division. Energy Division will serve notice of the release of the RFP and of the winning bidder on the service list for this proceeding.

6.2. Program Implementation via a Tier 3 Advice Letter

Once chosen, the PA shall be responsible for developing program rules and procedures consistent with the policies and guidance contained in this decision. This decision adopts broad policies for program eligibility (Section 3.1.1. above), additional program requirements (e.g., for third-party ownership, job training, and energy efficiency services), and program operation. Once selected, the PA shall hold one or more workshops with interested parties to receive input on appropriate methods for implementing the program, within

⁷² The information provided in Appendix A of D.08-10-036 is also available to Energy Division staff to use in developing criteria for the RFP for the PA.

the policy guidance provided here. In addition, we direct the utilities to enter into appropriate non-disclosure agreements with the chosen PA, if necessary to facilitate the sharing of customer usage data and other personally identifiable information needed for the operation and administration of SOMAH. Based on stakeholder input, the PA shall propose a plan for implementing and operating the SOMAH program in compliance with this decision. Not later than August 30, 2018, the PA shall submit a Tier 3 implementation Advice Letter that includes a SOMAH Program Handbook for Commission consideration, subject to approval in a formal resolution. If appropriate, the Commission's Energy Division may modify the due date for this advice letter. The program implementation proposal shall include sections on at least the following subjects:

- 1) Application procedures;
- 2) Requirements for documentation of building, property, and project eligibility;
- 3) A program budget that includes line items for incentives and administrative activities, including but not limited to marketing, education, and outreach;
- 4) Specific job training requirements consistent with those defined in this decision;
- 5) Specific rules for implementing the third party ownership requirements defined here;
- 6) Specific energy efficiency requirements consistent with those adopted here;
- 7) Data collection and reporting requirements, including report formats;

The proposal will also include rules for the following issues not addressed in detail in this decision:

- 8) Supplier Diversity Rules;

- 9) Interim targets for capacity goals, consistent with the AB 693 requirement for 300 MW before 2030.

In addition, we encourage the statewide PA to propose a process by which individual SOMAH Program projects are required to solicit multiple bids, and submit its proposal as part of its Tier 3 implementation Advice Letter. As noted by several parties in comments on the proposed decision, the incentive levels adopted for generation allocated to tenant accounts may be at the higher end of estimates of per kilowatt market costs for installation of solar distributed generation projects of the type to be installed through SOMAH. A well-designed competitive bidding process at the project level, if adopted by this Commission as part of the implementation process for SOMAH, may help to control SOMAH project costs by keeping them closer to market costs. In addition, a thoughtful competitive bidding process at the project level could include consideration of factors such as local hiring, job training, and coordination with other clean energy programs.

The Commission may provide further direction on the contents of this Tier 3 implementation Advice Letter through one or more future Commission decisions or resolutions. Once the SOMAH Program Handbook is adopted, the PA may propose program adjustments to the Program Handbook via a Tier 2 Advice Letter. The assigned Commissioner and/or ALJ will determine if suggested program changes require modification of a Commission order, and if so, the change would be considered by the full Commission, following notice to parties and an opportunity to comment.

7. Evaluation, Measurement, and Verification

Every three years, Energy Division shall select an independent evaluator through an RFP process similar to that used to select the Program Administrator.

The consultant hired through this process will evaluate the effectiveness and efficiency of both the PA and the SOMAH program overall. The initial evaluation will be conducted in time to inform the 2020 report to the State Legislature, with similar evaluation reports for the State Legislature every three years thereafter as required in Section 2870(j)(1). Specifically, the Commission's Energy Division will select the PA through an RFP process managed by SDG&E on behalf of the Commission. The RFP process shall be led by staff from the Commission's Energy Division, and Energy Division staff will make the final decision on the winning bidder.

8. Energy Division Budget and Activities

Up to \$2 million per year from the participating utilities' GHG proceeds may be used to reimburse energy division for activities related to implementation and oversight of the SOMAH program. Activities funded by this budget will include, but may not be limited to: Energy Division's preparation of an annual report to the State Legislature as required at Section 2870(j)(3); any Energy Division activities related to the competitive bidding processes required in this decision; and all evaluation, measurement, and verification activities.

As discussed elsewhere in this decision, Energy Division staff will make the final determinations on the selection of a Program Administrator and a separate evaluation consultant through competitive bidding processes. The utilities and the PA will work with Energy Division in the development of implementation procedures, and Energy Division staff may hold or direct the utilities and PA to hold workshops to gather input on SOMAH rules and operations. Utilities and the PA will also work with Energy Division staff to develop reporting requirements and specific report formats sufficient to support

the required annual report to the State Legislature. Energy Division may modify such reporting requirements and formats when necessary to ensure effective oversight of SOMAH and to gather data on the program's operation and outcomes as necessary to inform the 2020 SOMAH program review.

9. 2020 Program Review

The initial evaluation of the SOMAH program conducted prior to the 2020 report to the State Legislature will also provide the basis for the Commission to assess, and if necessary change, program policies and operations. If appropriate based on the program evaluation, the Commission may choose to modify program elements including, but not limited to: tenant and common area incentive levels; incentive levels and the methodology for determining the annual step-down in incentive levels; job training, local hiring, and energy efficiency requirements for participating service providers; the participation of master meter/submeter properties in the program; and the required proportion of system generation dedicated to tenant accounts. Similarly, if necessary based on poor performance by the initial PA, the Commission may decide to choose a new PA using a competitive bidding process comparable to the one described in Section 6.2.

10. Comments on Proposed Decision

The proposed decision of the ALJs in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure.

Sixteen parties or sets of parties filed timely opening comments on the proposed decision⁷³ on November 20, 2017, and 13 parties filed timely⁷⁴ reply comments.⁷⁵

Comments on the proposed decision were generally supportive of the SOMAH program, but parties provided a number of suggestions for possible clarifications and modifications in certain areas, often reiterating points from their earlier filings on these issues. Parties' comments on the PD addressed a variety of issues, including:

- 1) suggestions for modification of the SOMAH eligibility requirements,
- 2) the selection process for and responsibilities of the PA,
- 3) the tenant and common area load allocations, and the need to ensure that tenants receive one hundred percent of the benefits of the VNEM credits allocated to their accounts,
- 4) the exemption of participating tenant and common area accounts from mandatory and default TOU rates,
- 5) program requirements for workforce development and energy efficiency services,
- 6) the program incentive levels and incentive stepdown mechanism,
- 7) the method for identifying DACs for participation in SOMAH,

⁷³ The following parties filed opening comments: CalSEIA, CCA Parties (Marin Clean Energy, Sonoma Clean Power, Peninsula Clean Energy and the City of Lancaster, jointly), CSE, Everyday Energy, Greenlining and Brightline (jointly), GRID Alternatives, Liberty, the MASH Coalition, the Nonprofit Solar Coalition (California Housing Partnership Corporation, National Housing Law Project, and the Natural Resources Defense Council, jointly), ORA, PacifiCorp, PG&E, SCE, SDG&E, TURN, Vote Solar, IREC

⁷⁴ The due date for reply comments on the proposed decision was extended from November 27, 2017, to November 30, 2017, via an email from the assigned Administrative Law Judge.

⁷⁵ The following parties filed reply comments: Brightline, CalSEIA, CSE, Everyday Energy, GRID Alternatives, IREC, the MASH Coalition, ORA, NSC and CEJA (jointly), PG&E, SCE, SDG&E, and Vote Solar.

- 8) program budget, funding, and accounting requirements, and
- 9) the participation of Liberty and PacifiCorp.

This section notes modifications that have been made throughout the decision in response to comments, and summarizes other party comments that did not result in substantive changes to the document.

Specifically, in response to party comments, we have clarified language in the decision related to the provision of energy efficiency and workforce development requirements and added requirements for tracking of job training and local hiring. We have also clarified processes and deadlines related to the development of new VNEM tariffs, and for the establishment of balancing accounts to track utility program expenses. The decision has also been revised to provide more specific information on the roles and responsibilities of the IOUs, the PA, and the Commission's Energy Division in the implementation and support of the SOMAH program, and to provide more detail on the anticipated 2020 program review. Though the decision retains the exemption of SOMAH tenant accounts from mandatory TOU requirements, this decision does not exempt these accounts from default TOU when it is implemented for residential customers. This decision also clarifies that funding from one utility may not be used to provide incentives for projects in a different utility's service territory, and requires the PA to propose a mechanism to ensure this. The decision has also been clarified to explicitly adopt some MASH program characteristics that were not fully described in the original PD.

In contrast, we have not made changes to the program eligibility requirements. Several parties suggest modifications to the eligibility requirements, including the inclusion in the program of new construction and master-metered properties with submetered tenants. We decline to include these

modifications, which had already been suggested in earlier rounds of party comments, in the decision. Because submetered tenants are not direct customers of a utility, the Commission cannot ensure that VNEM discounts provided to the master meter account would be passed through to low-income tenants. As a result, it would not be possible to ensure that tenants receive all of the benefits of VNEM credits allocated to customers, and the exclusion of these accounts is a necessary safeguard to protect the integrity of the SOMAH program. With respect to new construction, the text of the decision has been clarified to better articulate the reasons for focusing SOMAH on existing construction.

Similarly, we have not made significant changes to the program's administrative structure or the responsibilities and desired qualifications of the eventual program administrator. Most party comments expressed support for the selection of a single, statewide third party administrator for SOMAH, but PG&E and SDG&E reiterate their earlier objections to the use of a single program administrator, asserting that continuing the MASH system of separate administrators in each utility's service territory would reduce administrative costs and be more efficient. In contrast, we agree with CSE that the single program administrator model already in use in the SASH program will increase consistency in SOMAH program administration throughout the state, and avoid duplication in the development of program forms and processes. At the same time, some parties suggest that the anticipated scope of work and qualifications for the PA are either too broad or too narrow. For reasons discussed in the text, we find the requirements contained in the proposed decision to be appropriate and consistent with the program's purpose and its authorizing legislation. In addition, we are not persuaded by Liberty and PacifiCorp's comments that they should be exempted from participation in SOMAH, and this decision clarifies

that these companies must develop and implement appropriate VNEM tariffs that comply with the requirements adopted here.

All comments and reply comments have been given full consideration and, where appropriate, clarifying revisions have been made to the PD.

11. Assignment of Proceeding

Martha Guzman Aceves is the assigned Commissioner and Jessica T. Hecht and Valerie Kao are the assigned Administrative Law Judges and Presiding Officers in this proceeding.

Findings of Fact

1. AB 693, codified at California Public Utilities Code Section 2870, creates the Multifamily Affordable Housing Solar Roofs Program to provide financial incentives for the installation of solar PV energy systems on multifamily affordable housing properties throughout California.

2. Section 2870 limits participation in the Multifamily Affordable Housing Solar Roofs Program, implemented here as the Solar on Multifamily Affordable Housing Program, to properties meeting the definition of low-income residential housing set forth in Section 2852(a)(3)(A) that are either located in a DAC as identified by CalEPA pursuant to Health and Safety Code Section 39711, or in which at least 80% of the households have household incomes at or below 60% of the area median income.

3. Section 2870(a)(3) requires the Commission to use the specific DAC definition used by CalEPA pursuant to Health and Safety Code Section 50052.5 for participation in the SOMAH program. Currently under this definition, DACs are areas that score in the top 25% of census tracts statewide on a set of environmental, health, and socioeconomic data from 20 indicators. In addition, 22 census tracts in the highest 5% of CalEnviroScreen's Pollution Burden, but

that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are currently also designated by CalEPA as DACs.

4. Section 2870(g)(1) requires that the utility bill reductions in the SOMAH program must be achieved through tariffs that allow for the allocation of credits, such as virtual net metering tariffs.

5. Section 2870(g)(1) requires that generation funded through SOMAH shall be primarily used to offset electricity usage by low-income tenants.

6. Section 2870(g)(2) requires the Commission to ensure that low-income tenants participating in SOMAH receive a direct economic benefit from participation in the program.

7. VNEM tariffs allow bill credits for the output of a single solar installation to be shared with tenants in multifamily housing.

8. Most CCAs offer a VNEM tariff to their customers.

9. Federally financed or subsidized housing arrangements that do not allow the tenant the benefit of utility bill reductions do not meet the requirement that tenants receive a direct economic benefit of a solar generation system installed through SOMAH.

10. It is not possible to ensure that tenants in properties with master meters and submeters receive the direct economic benefits of a solar generation system installed through SOMAH.

11. Section 2870(f)(3) requires the Commission to ensure that third-party owned systems installed with SOMAH incentives will perform as projected and will not adversely affect the interests of tenants.

12. A Performance Monitoring and Reporting Service can ensure that third-party owned systems perform as expected and do not adversely affect the interests of tenants.

13. Section 2870(f)(6) requires the Commission to provide economic benefits to disadvantaged communities by establishing local hiring requirements for SOMAH contractors.

14. Section 2870 (f)(7) requires the Commission to establish energy efficiency requirements at least equal to those applicable in the current MASH program for SOMAH participants.

15. Section 748.5(c) reserves up to 15% of the proceeds from the sale of GHG allowances described in Section 748.5 for use in clean energy and energy efficiency projects.

16. Section 2870(c), adopted in June 2017, allocates two-thirds of the funds available under Section 748.5(c) or \$100,000,000 per year, whichever is less, to the SOMAH program.

17. The Energy Resource Recovery Account (ERRA) and the Energy Cost Adjustment Clause (ECAC) are the appropriate proceedings for the utilities to estimate and reserve SOMAH budgets consistent with Section 2870(c).

18. Section 2870(e) requires that not more than 10% of the funds allocated to the SOMAH program be used for administration.

19. Liberty and PacifiCorp should only be exempted from participation in SOMAH if they can show that they have no eligible properties in their service territories.

20. Liberty and PacifiCorp have not shown that there are no eligible properties in their service territories.

21. Use of a single, statewide program administrator will improve consistency in program implementation and simplify communication about the program with potential participants.

22. The MASH rules described in Section 3.4 of this decision are foundational requirements modeled after existing rules of the MASH program, and provide valuable safeguards to protect customers and ensure the integrity of the program.

23. Use of a single, statewide program administrator will increase the efficiency and cost-effectiveness of the program by avoiding the need to create multiple administrative entities, and will facilitate the participation of Liberty and PacifiCorp.

24. A competitive bidding process utilizing an RFP is an appropriate mechanism for use in the selection of the SOMAH PA.

25. A competitive bidding process utilizing an RFP is appropriate for use in the selection of a SOMAH measurement and evaluation contractor.

26. Creation of a new AB 693/SOMAH balancing account will facilitate tracking of the SOMAH program budget and expenditures.

27. Section 2870(f)(4) requires the Commission to establish incentive levels that are aligned with installation costs for solar energy systems in affordable housing markets and take into account federal investment tax credits and contributions from other sources to the extent feasible.

28. Section 2870(j)(1) requires the Commission to conduct an evaluation of the SOMAH program every three years beginning in 2020.

Conclusions of Law

1. The SOMAH, as adopted in this decision, is consistent with the requirements of Section 2870.

2. It is reasonable and consistent with the requirements of Section 2870(g)(1) for the SOMAH program to provide benefits to low-income tenants using VNEM credits.

3. It is reasonable and consistent with Section 2870(g)(1) to require that tenants receive at least 51% of the VNEM credits from any solar project receiving SOMAH incentives.

4. It is reasonable to allow properties with CCA customers to participate in SOMAH, if the CCA customer is served under a VNEM tariff.

5. It is reasonable to require the utilities participating in this program to implement a VNEM tariff that complies with the requirements of this decision.

6. It is reasonable to exempt tenants participating in SOMAH from the requirement that applies to other customers using the NEM successor tariff to take service under a TOU rate. Tenants will still default to TOU rates when they are implemented for residential customers, but may choose to opt out of TOU rates.

7. It is reasonable for the common area or host accounts associated with SOMAH projects to remain subject to otherwise applicable default or mandatory TOU rates.

8. It is reasonable to require Liberty and PacifiCorp to participate in the SOMAH program, both by providing funding from their GHG allowances and making the program available to their customers.

9. The Commission should choose a statewide PA for SOMAH through a competitive bidding process led by Energy Division.

10. It is reasonable for each IOU to reserve the full 10% of its allowance proceeds as part of its ERRRA (or for Liberty and PacifiCorp, ECAC) applications, updating those estimates if appropriate during the proceeding.

11. It is reasonable and consistent with Section 2870(c) to require PG&E, SDG&E, SCE, Liberty, and PacifiCorp each to contribute its proportionate share

of \$100,000,000 each year for the SOMAH program, calculated based on the total proceeds of the last four quarterly auctions.

12. It is reasonable for the program to provide incentive amounts that cover the full installation cost of solar generation systems dedicated to tenant load.

13. It is reasonable to provide an incentive of less than the full cost of installation for solar generation systems dedicated to accounts associated with a SOMAH project that are managed by the property owner or manager, to encourage further energy efficiency or demand reduction activities.

14. The Commission should adopt the following incentive structure:

1. TAX CREDITS		\$ per AC Watt INCENTIVE	
ITC	LIHTC	Tenant	Common Area
No	No	\$ 3.20	\$ 1.10
Yes	No	\$ 2.25	\$ 0.80
No	Yes	\$ 2.25	\$ 0.80
Yes	Yes	\$ 1.60	\$ 0.60

15. Incentive levels should be adjusted each year to reflect decreases in solar installation costs, not to exceed 5% in a given year.

16. It is reasonable to apply the MASH program rules described in Section 3.4 of this decision to the SOMAH Program.

17. The Commission’s Energy Division should select a PA using an RFP process managed on the Commission’s behalf by one of the IOUs.

18. Commission staff should play a central role in developing the RFP and make the final decision on the winning bidder.

19. It is reasonable to require the PA to develop program rules and procedures consistent with this decision, and to submit those processes to the

Commission for consideration via a Tier 3 Advice Letter, subject to approval in a formal resolution.

20. Energy Division staff should select a measurement and evaluation contractor, using a process similar to that used for selection of the PA.

O R D E R

IT IS ORDERED that:

1. The Solar on Multifamily Affordable Housing program, as described in this decision and summarized in Appendix B, is adopted, and will operate in the service territories of Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp Company, starting as soon as practicable in 2018.

2. Within 60 days of the date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp Company, each shall file a Tier 1 Advice Letter creating a balancing account to track its authorized funding for Solar on Multifamily Affordable Housing.

3. Within 90 days of the date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp Company, each file a Tier 1 advice letter designating a VNEM tariff for use by SOMAH participants. The advice letter may modify an existing VNEM tariff used for the MASH program, such as that used by MASH participants, to comply with this decision, or may develop a new VNEM tariff based on the VNEM tariff used for the MASH program, as appropriate.

4. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, each shall reserve 10% of the proceeds from the sale of greenhouse gas allowances defined in Public Utilities Code Section 748.5 through its annual Energy Resource Recovery Account (ERRA) proceedings for use in the Solar on Multifamily Affordable Housing Program, starting with its ongoing 2018 ERRA forecast proceeding.

5. Liberty Utilities Company and PacifiCorp Company each shall reserve 10% of the proceeds from the sale of greenhouse gas allowances defined in Public Utilities Code Section 748.5 through its annual Energy Cost Adjustment Clause proceeding for use in the Solar on Multifamily Affordable Housing Program, starting with its ongoing 2018 Energy Cost Adjustment Clause proceeding.

6. A single, statewide Program Administrator (PA) for the Solar on Multifamily Affordable Housing Program shall be chosen through a Request for Proposal (RFP) process, as outlined in Section 6.1. of this decision. Specifically, Commission's Energy Division will select the PA through an RFP process managed by Southern California Edison on behalf of the Commission. The RFP process shall be led by staff from the Commission's Energy Division, and Energy Division will make the final decision on the winning bidder. The RFP process will be concluded and Southern California Edison will enter into a contract with the chosen PA by April 30, 2018. The Energy Division Director may modify the April 30, 2018, deadline by letter for good cause.

7. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp Company shall each contribute its proportionate share of \$100,000,000 on an annual basis for management of the Solar on Multifamily Affordable Housing

Program. Each company's share will be calculated based on its share of allowance sale proceeds over the previous four quarters.

8. Once selected, the Program Administrator shall hold one or more workshops with interested parties to receive input on appropriate methods for implementing Solar on Multifamily Affordable Housing consistent with the policy guidance provided in this decision.

9. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Liberty Utilities Company, and PacifiCorp Company, may enter into an appropriate non-disclosure agreement with the chosen PA if necessary to facilitate the sharing of customer usage data and other personally identifiable information needed for the operation and administration of SOMAH.

10. The Program Administrator (PA) shall propose a plan for implementing and operating the Solar on Multifamily Affordable Housing (SOMAH) program in compliance with this decision. By August 31, 2018, the PA shall submit a SOMAH Program Handbook for Commission consideration as a Tier 3 Advice Letter, subject to approval in a formal resolution. The Energy Division Director may modify the August 31, 2018, deadline by letter for good cause. The program implementation proposal shall include sections on at least the following subjects:

- a. Application procedures
- b. Requirements for documentation of building, property, and project eligibility
- c. Specific job training and, if appropriate, local hiring requirements consistent with those defined in this decision
- d. Specific rules for implementing the third party ownership requirements defined here

- e. Specific energy efficiency requirements consistent with those adopted here
- f. Data collection and reporting requirements, including report formats
- g. Supplier Diversity Rules
- h. Interim targets for capacity goals, consistent with the Assembly Bill 693 requirement for 300 Megawatts before 2030

11. The Program Administrator (PA) shall work with Energy Division to develop reporting requirements and formats, including but not limited to reporting of data on projects approved and completed, incentives reserved and paid for installations, job training, local hiring, and coordination with clean energy programs. Energy Division may modify those requirements as needed to inform evaluation, measurement, and verification activities.

12. The Program Administrator (PA) is authorized to provide incentives to projects on any federally funded properties that would allow the tenant to retain the economic benefit of the generation allocated to the tenant, if the housing is otherwise eligible for the program and the project meets all other requirements for receiving incentives. The PA may also explore the possibility that the U.S. Department of Housing and Urban Development may make revisions to its guidelines that would enable wider participation in the program.

13. Every three years, Energy Division shall select a contractor to conduct measurement and verification of the Solar on Multifamily Affordable Housing program through a Request for Proposal (RFP) process similar to that used for selection of the Program Administrator. An initial evaluation will be conducted in time to inform the 2020 report to the State Legislature, as required in Section 2870(j)(1). Specifically, the Commission's Energy Division will select the Program Administrator through an RFP process managed by San Diego Gas &

Electric Company on behalf of the Commission. The RFP process shall be led by staff from the Commission's Energy Division, and Energy Division staff will make the final decision on the winning bidder

14. Up to \$2 million per year from the SOMAH administrative budget may be used to reimburse Energy Division for activities related to implementation and oversight of the SOMAH program. Activities funded by this amount will include, but may not be limited to: Energy Division's preparation of an annual report to the State Legislature as required at Section 2870(j)(3); any Energy Division activities related to the competitive bidding processes required in this decision; and all evaluation, measurement, and verification activities.

15. Rulemaking 14-02-007 remains open to address additional issues, including consideration of programs to increase the availability of solar distributed generation in disadvantaged communities.

This order is effective today.

Dated _____, at San Francisco, California.

APPENDIX A



State of California

PUBLIC UTILITIES CODE

Section 2870

2870. (a) As used in this section, the following terms have the following meanings:

(1) “CARE program” means the California Alternate Rates for Energy program established pursuant to Section 739.1.

(2) “Program” means the Multifamily Affordable Housing Solar Roofs Program established pursuant to this chapter.

(3) “Qualified multifamily affordable housing property” means a multifamily residential building of at least five rental housing units that is operated to provide deed-restricted low-income residential housing, as defined in clause (i) of subparagraph (A) of paragraph (3) of subdivision (a) of Section 2852, and that meets one or more of the following requirements:

(A) The property is located in a disadvantaged community, as identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code.

(B) At least 80 percent of the households have incomes at or below 60 percent of the area median income, as defined in subdivision (f) of Section 50052.5 of the Health and Safety Code.

(4) “Solar energy system” means a solar energy photovoltaic device that meets or exceeds the eligibility criteria established pursuant to Section 25782 of the Public Resources Code.

(b) (1) Adoption and implementation of the Multifamily Affordable Housing Solar Roofs Program may count toward the satisfaction of the commission’s obligation to ensure that specific alternatives designed for growth among residential customers in disadvantaged communities are offered as part of the standard contract or tariff authorized pursuant to paragraph (1) of subdivision (b) of Section 2827.1.

(2) Nothing in this section shall preclude electrical corporations from offering and administering a distributed energy resource program, including solar energy systems, in disadvantaged communities offered under current or proposed programs using funds provided under subdivision (c) of Section 748.5 or programs proposed to comply with paragraph (1) of subdivision (b) as approved by the commission.

(c) The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or 66.67 percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Solar Roofs Program, beginning with the fiscal year commencing July 1, 2016, and ending with the fiscal year ending June 30, 2020. The commission shall continue authorizing the allocation of these funds through June 30, 2026, if the

commission determines that revenues are available after 2020 and that there is adequate interest and participation in the program.

(d) The commission shall consider the most appropriate program administration structure, including administration by a qualified third-party administrator, selected by the commission through a competitive bidding process, or administration by an electrical corporation, in an existing or future proceeding.

(e) Not more than 10 percent of the funds allocated to the program shall be used for administration.

(f) (1) By June 30, 2017, the commission shall authorize the award of monetary incentives for qualifying solar energy systems that are installed on qualified multifamily affordable housing properties through December 31, 2030. The target of the program is to install a combined generating capacity of at least 300 megawatts on qualified properties.

(2) The commission shall require that the electricity generated by qualifying renewable energy systems installed pursuant to the program be primarily used to offset electricity usage by low-income tenants. These requirements may include required covenants and restrictions in deeds.

(3) The commission shall require that qualifying solar energy systems owned by third-party owners are subject to contractual restrictions to ensure that no additional costs for the system be passed on to low-income tenants at the properties receiving incentives pursuant to the program. The commission shall require third-party owners of solar energy systems to provide ongoing operations and maintenance of the system, monitor energy production, and, where necessary, take appropriate action to ensure that the kWh production levels projected for the system are achieved throughout the period of the third-party agreement. Such actions may include, but are not limited to, providing a performance guarantee of annual production levels or taking corrective actions to resolve underproduction problems.

(4) The commission shall ensure that incentive levels for photovoltaic installations receiving incentives through the program are aligned with the installation costs for solar energy systems in affordable housing markets and take account of federal investment tax credits and contributions from other sources to the extent feasible.

(5) The commission shall require that no individual installation receive incentives at a rate greater than 100 percent of the total system installation costs.

(6) The commission shall establish local hiring requirements for the program to provide economic development benefits to disadvantaged communities.

(7) The commission shall establish energy efficiency requirements that are equal to the energy efficiency requirements established for the program described in Section 2852, including participation in a federal, state, or utility-funded energy efficiency program or documentation of a recent energy efficiency retrofit.

(g) (1) Low-income tenants who participate in the program shall receive credits on utility bills from the program. The commission shall ensure that utility bill reductions are achieved through tariffs that allow for the allocation of credits, such as virtual net metering tariffs designed for Multifamily Affordable Solar Housing

Program participants, or other tariffs that may be adopted by the commission pursuant to Section 2827.1.

(2) The commission shall ensure that electrical corporation tariff structures affecting the low-income tenants participating in the program continue to provide a direct economic benefit from the qualifying solar energy system.

(h) Nothing in this chapter is intended to supplant CARE program rates as the primary mechanism for achieving the goals of the CARE program.

(i) The commission shall determine the eligibility of qualified multifamily affordable housing property tenants that are customers of community choice aggregators.

(j) (1) Every three years, the commission shall evaluate the program's expenditures, commitments, uncommitted balances, future demands, performance, and outcomes and shall make any necessary adjustments to the program to ensure the goals of the program are being met. If, upon review, the commission finds there is insufficient participation in the program, the commission may credit uncommitted funds back to ratepayers pursuant to Section 748.5.

(2) As part of the annual workplan required pursuant to Section 910, the commission shall provide an annual update of the Multifamily Affordable Housing Solar Roofs Program that shall include, but not be limited to, the number of projects approved, number of projects completed, number of pending projects awaiting approval, and geographic distribution of the projects.

(Amended by Stats. 2017, Ch. 26, Sec. 83. (SB 92) Effective June 27, 2017.)

Appendix B

APPENDIX B

Solar on Multifamily Affordable Housing (SOMAH) Program

The Solar on Multifamily Affordable Housing (SOMAH) Program offers incentives for solar installations on existing multifamily affordable housing that meet the definition of low-income residential housing established in Pub. Util. Code § 2852(a)(3)(A).¹ The program will pay incentives towards solar energy systems on qualifying properties in the service areas of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company, Liberty Utilities, and PacifiCorp where solar energy systems meet the definition established in Public Resources Code § 25781(e) as “a solar energy device that has the primary purpose of providing for the collection and distribution of solar energy for the generation of electricity, that produces at least one [kilowatt] of electricity, and not more than five [megawatts], alternating current rated peak electricity, and that meets or exceeds the eligibility criteria established pursuant to § 25782.”

•

The Program Administrator (PA) shall propose a plan for implementing and operating the SOMAH program in compliance with this decision. The PA shall submit a SOMAH Program Handbook for Commission consideration as a Tier 3 Advice Letter, subject to approval in a formal resolution. Once the SOMAH Program Handbook is adopted, the Program Administrator may propose program adjustments to the Program Handbook via a Tier 2 Advice Letter. Pursuant to party responses and Energy Division review of the advice letter, staff will determine if suggested program change(s) require a resolution or modification of a Commission order, and if so, the change(s) could be considered by the full Commission, following notice to parties and an opportunity to comment.

To qualify for incentives under this program, a property must have at least five rental housing units that meet the definition of deed-restricted low-income residential housing as defined in Public Utilities Code § 2852(a)(3)(A) and the property must either:

¹ All statutory references are to the Public Utilities Code, unless otherwise noted.

- be located in a disadvantaged community (DAC) as identified by CalEPA pursuant to Health and Safety Code Section 39711,² or
- have at least 80 percent of the households in the building must have household incomes at or below 60 percent of the area median income.³

Applicants – namely affordable housing property owners and/or operators – may apply for incentives.

Incentive Structure

The program’s incentive structure provides fixed, up front, capacity-based incentives for qualifying solar energy systems, using the Expected Performance Based Buydown (EPBB) methodology adopted in Decision 06-08-028. The EPBB methodology estimates solar system performance based on system orientation and design. Incentives vary depending on whether the project receives either income tax credits (ITC) and/or low income housing tax credits (LIHTC). The SOMAH program’s incentive structure reduces the incentive level by 30 percent if the project receives either the ITC or the LIHTC, and 50 percent if the project receives both benefits. Similarly, the incentive for the portions of system load intended for tenants are higher than the incentive for the portion allocated to common areas. This incentive structure is shown in the below Table 1.

Adopted Incentive Rates

Table 1

Tax Credits		\$/ AC W Incentive	
ITC	LIHTC	Common Area	Tenant
No	No	\$1.10	\$3.20
Yes	No	\$0.80	\$2.25
No	Yes	\$0.80	\$2.25
Yes	Yes	\$0.60	\$1.60

The Commission will periodically evaluate incentive levels and may adjust them as needed based on solar costs or other relevant market factors. Per the Decision,

² AB 693 requires that in the context of this program, disadvantaged communities are those identified by the California Environmental Protection Agency pursuant to California Health and Safety Code Section 39711. The California Environmental Protection Agency (CalEPA) defines disadvantaged communities as those scoring in the top 25% of census tracts statewide on a set of environmental, health, and socioeconomic data from 20 indicators. In addition, 22 census tracts in the highest 5% of CalEnviroScreen’s Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as disadvantaged communities.

³ Area median income as defined in Section 50052.5 HSC.

incentive levels will decrease by the annual percent decline in residential solar costs as reflected by National Renewable Energy Laboratory (NREL) reports⁴ of price and cost breakdowns, or 5% annually, whichever is less. The incentives adopted here will be re-evaluated when additional information on the costs of installation for multifamily affordable housing become available, most likely during the program evaluation scheduled for 2020. We expect that review to be informed by data collected by the Program Administrator and others on the projects developed through the SOMAH program.

Budget

The annual SOMAH budget is to be authorized as \$100,000,000 or 10% of the IOUs' annual greenhouse gas allowance proceeds, whichever is less.⁵

The administrative budget is capped at a maximum of \$10M of program funds per year.

In accordance with AB 693, Energy Division is directed to provide regular evaluations to the legislature of the SOMAH Program that shall include information on, but not be limited to, the number of projects approved, number of projects completed, number of pending projects awaiting approval, and geographic distribution of the projects. Energy Division is authorized up to \$2 million per year of the administrative budget to hire an independent contractor through competitive solicitation to conduct, every three years, starting in 2020, a process evaluation of the program and the Program Administrator.

Should the Commission determine that revenues are available after June 30, 2020 and that there is adequate interest and potential participation in the program, SOMAH will operate until June 30, 2026.

Major Responsibilities of the Program Administrator

⁴ <https://www.nrel.gov/docs/fy15osti/64746.pdf>.

⁵ Public Utilities Code Section 2870(c) provides a specific funding mechanism:

The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or 66.67 percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5. . .

The revenues described in Section 748.5 are the proceeds from the sale of greenhouse gas (GHG) allowances allocated to California's investor-owned utilities for the benefit of their ratepayers. Section 748.5(c) reserves up to 15 percent of that revenue for use in clean energy and energy efficiency projects, with the remaining revenues returned to customers.

The SOMAH program shall be administered by a single, statewide Program Administrator.

The PA will be responsible for ensuring that all participants in SOMAH, including applicants approved to receive services and contractors that provide those services, meet all program requirements by implementing a process for documenting the eligibility of all program applicants, including third party ownership situations. The documentation should include safeguards to ensure that incentives paid for projects in a particular IOU's service territory do not exceed the funding received from that IOU over the life of the program.

The PA will develop processes for verifying the quality and completeness of work performed by participating contractors and for ensuring proper procedures for the payment of program incentives.

Furthermore, the PA will ensure the development of program materials and procedures, including: digital application forms, data collection methods and databases, and a SOMAH program handbook that will contain information comparable to the current MASH handbook. The PA must ensure that tenants must receive the full economic benefit of the generation allocated to them – this requires documentation of per-project VNEM tariff allocations and a requirement that the host customer sign an Affidavit Ensuring Economic Tenant Benefit.

Under the auspices of general program management, the PA will support the Commission's Energy Division throughout the duration of the SOMAH program assisting with writing reports and facilitating public comment processes through meetings and workshops.

The PA will provide technical assistance with the application processes and through collecting and facilitating access to program resources, including but not limited to a list of qualified agencies providing assistance to affordable housing, a list of qualified job training organizations, and energy efficiency information and best practices. The PA will oversee contractor compliance so that job training, energy efficiency and other program requirements are met.

Marketing, Education, and Outreach

The Program Administrator shall conduct marketing, outreach, and education services for the SOMAH program in cooperation or under contract with entities

with experience in affordable housing. The Program Administrator shall propose a Marketing and Education budget out of their administrative budget and work with community stakeholders to reach eligible property owners and to develop training and workforce advancement strategies for reaching disadvantaged communities. The Program Administrator shall coordinate the development of this program with statewide education and outreach efforts, as described in D.16-03-029 and D.16-09-020. The Program Administrator should develop SOMAH marketing and outreach budgets and plans and submit these plans to Energy Division and be posted to the California Distributed Generation Statistics website.

The SOMAH marketing plan should contain a description of the proposed budget and plans for marketing and outreach services, including the entities the Program Administrator expects to contract with and for what services.

Providing Economic Development Benefits Through Job Training and Local Hiring

The PA is required to collect and track data on both job training and local hiring provided by solar installers working on projects receiving SOMAH incentives. This tracking must include data on the number of training participants and hours, as well as the amount of local labor, provided by each solar installation contractor working on SOMAH projects. If possible, the PA should also track data related to the continuing employment of job training participants in the solar industry after their training experience.

The Program Administrator will develop local hiring plans to promote economic development in disadvantaged communities and job training requirements similar to those currently in place for the MASH program.

Energy Efficiency Services and Coordination with Other Clean Energy Programs

Properties served under the SOMAH program must be provided with energy efficiency services at least equal to those applicable in the current MASH program. This includes undergoing an energy efficiency audit and notifying tenants about the availability of the investor-owned utilities' Energy Savings Assistance Program.

The Program Administrator will be providing technical and program-alignment assistance to participating contractors and service providers. The PA will develop and propose methods to coordinate with other clean energy programs, in order to ensure that properties receiving SOMAH incentives are aware of and can access other sources of services and funding for which they may be eligible. In this capacity, we require the Program Administrator to provide participating property owners with information about and contact information for the serving utility's ESA Program multifamily single-point-of-contact adopted in D.16-11-022.

Program Reporting/Data Collection

The Program Administrator shall post to the California Distributed Generation Statistics website semi-annual reports of administrative expenditures incurred for the SOMAH program. The reports should provide detail of administrative expenditures by category (i.e., marketing and outreach, evaluation, and other administration costs.)

The Program Administrator shall submit semi-annual reports to the Director of the Energy Division on progress of the SOMAH program. The semi-annual reports should include the following items, but Energy Division may modify this list as it deems appropriate:

- Number of applications received
- Number of applications accepted
- Incentives paid
- Size of installations and expected aggregate annual output
- Total system cost in \$/kilowatt before subsidy
- Progress of installations• Geographic areas served
- Average number of bids received per project (if applicable)
- Installer used
- Administrative and marketing expenditures
- Average tenant bill savings
- Number of unique trainees
- Total number of trainee hours
- Number of hired local contractors and subcontractors
- Number of jobs generated
- Number of local jobs generated

The Program Administrator shall work with the consultant that manages the California Distributed Generation Statistics website to ensure all projects that apply for SOMAH incentives are publically posted. The data should be reported by each program qualification path/eligibility grouping.

The Program Administrator shall submit to a periodic audit of program expenditures. The purpose of the audit is to ensure program funds are paid to legitimate and verified installations of solar energy systems on qualifying multifamily affordable housing and that administrative funds are spent in a reasonable and appropriate manner.

Program Evaluation

Every three years, Energy Division shall select an independent evaluator through a Request for Proposal (RFP) process to review both the Program Administrator and the SOMAH program. The evaluation should include, but is not limited to, the following factors:

- Number of multifamily buildings and properties served
- Number of low income households served
- Cost of program per multifamily building and property (both incentive costs and total costs including Program Administration)
- Program expenditures and uncommitted balances by program component (i.e., administration, marketing, incentives, etc.)
- Participation levels in relation to market sector
- Average system costs and incentives paid
- The average amount energy bill is reduced per residence/tenant (both in dollars and kilowatt hours)
- Other, non-solar energy saving measures property owners/tenants have implemented along with their solar installation
- Customer and tenant satisfaction
- Location of properties served
- Average number of bids received per project (if applicable)

- Location and number of eligible properties not served
- Geographic coverage across the state, including Disadvantaged Communities
- The effectiveness of marketing and outreach efforts
- The effectiveness of energy efficiency measures as related to PV systems
- System performance and maintenance adequacy
- The effectiveness of job training activities
- Number of leveraged job training programs
- Number of local job hires linked to the program
- Number of trainees and job outcomes

The program evaluation will rely upon Commission adopted evaluation protocols as adopted for utility energy efficiency programs. In particular, the evaluation should draw upon:

- Impact Evaluation protocols
- Process Evaluation protocols

(END OF APPENDIX B)

Appendix C

***** SERVICE LIST R.14-07-002*****

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