



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the Self-Generation
Incentive Program and Other Distributed
Generation Issues.

Rulemaking 08-03-008
(Filed March 13, 2008)

**THE DIVISION OF RATEPAYER ADVOCATES'
COMMENTS ON PROPOSED MULTI-FAMILY LOW INCOME CSI
PROGRAM**

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March 26, 2008

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DRA is pleased to participate in the Commission’s proceeding (R. 08-03-008) developing rules and procedures for the California Solar Initiative. The following comments represent DRA’s formal response to the staff Proposal for Solar Incentives for Multifamily Low Income Housing.

The proposal for a California Solar Initiative Low Income Multifamily Program (LI-MP) needs to address the following issues in order to be an effective use of ratepayer contributions:

1. The LI-MP should implement controls that ensure California’s low income families are the program’s beneficiaries. As currently structured, DRA believes the program will primarily benefit affordable housing developers, not the low income tenants of those housing developments. The program’s focus on incentivizing solar systems which serve “common areas” does not guarantee a transfer of the program benefits to low income tenants. The proposal acknowledges this risk on page 13 when it says that incentives “may not result in direct financial savings for individual tenants.” DRA recognizes that the intent of this proposed incentive is to benefit low income tenants indirectly by reducing development operating costs; however, DRA believes that as long as a solution which provides direct benefit to low income tenants is available, that solution should first be pursued.

Specifically, DRA agrees with the Energy Division (ED) staff conclusion that “Track 1B,” offering incentives to property managers who will use those resources to offset individual tenant load, is the “best way to provide direct benefits to low income tenants.”¹ By tying the solar system to an individual tenant meter, as Track 1B suggests, DRA believes the value of this program’s incentives will more likely result in reduced energy cost to low income tenants. Conversely, tying the solar system to “common areas” as Track 1A suggests results in a less direct value transfer. As such, DRA believes that concentrating the program’s resources on Track 1B is the most effective use of ratepayer dollars. We urge the Commission to mandate that a minimum of 50% of the \$108.3 million being allocated to this program be used to reduce the cost of energy services to low income families through Track 1B.

2. DRA commends ED staff for acknowledging the importance of energy efficiency in the affordable housing sector. DRA recommends that the energy efficiency requirements applied to the mainstream CSI program, including an energy audit and all measures deemed feasible by the property owner, also be applied to LI-MP
3. In the spirit of “integration” as defined by R.07-10-032 and R.07-12-051, DRA encourages the LI-MP to seek coordination and collaboration with the Commission’s Low Income Energy Efficiency Programs. The beneficiaries of each of these programs are likely to be one and the same. As such, the marketing and outreach of LIEE and LI-MP would benefit from coordination. More specifically, DRA believes that the program administrator should encourage all eligible LI-MP participants to also participate in LIEE. Not only would this outreach effort be a good service to customers, but it would also support the objectives of the Energy Action Plan which calls for improved energy efficiency marketing efforts.
4. DRA respectfully suggests that the acronym being used for this program, LI-MP, is unfortunate and should be reconsidered.

¹ CPUC, Energy Division. *California Solar Initiative Low Income Multifamily Program*. Page 18.

Respectfully submitted,

/s/ CHRISTOPHER CLAY

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March 26, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document **“THE DIVISION OF RATEPAYER ADVOCATES’ COMMENTS ON PROPOSED MULTI-FAMILY LOW INCOME CSI PROGRAM”** in **R.08-03-008.”**

A copy has been e-mailed to all known parties of record who have provided electronic mail addresses. In addition, all known parties of record who did not provide electronic mail addresses have been served by first-class mail.

Executed in San Francisco, California, on the 26th day of March, 2008.

/s/ HALINA MARCINKOWSKI

Halina Marcinkowski

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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