

Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies



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					SOMAH PA	
Item #	Page #	Findings	Best Practice / Recommendations	Disposition	Disposition Notes	
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	
1	126	Roughly ¼ of SOMAH applications were ineligible or cancelled due to owner disinterest. This has resulted in the loss of 129 SOMAH applications and the reserved capacity dropping to 68 MW _{AC} .	1A. Greater outreach from the SOMAH PA to applicants can help to identify potential cancellations before they occur allowing the PA an opportunity to offer solutions to combat the barriers to participation they are facing.	Other	<p>PA Response: The SOMAH is in agreement and is already addressing this recommendation at a small scale since the program was launched. The SOMAH PA already does outreach to Applicants to understand individual barriers faced on a project level and works one-on-one with Applicants to ensure projects stay within the program pipeline. The PA gathers and analyzes cancellation feedback provided by the Applicants to address any real time barriers that may arise in the future.</p> <p>In an effort to reduce the amount of cancellations due to eligibility, the PA will prioritize offering informal eligibility screenings for new applications that are in contact with the program prior to application submission in PowerClerk and further communicate this offering with potential participants. These informal screenings will help to reduce the number of projects that make the effort to submit an application for a project that is ultimately ineligible for the SOMAH program.</p> <p>Stakeholders: Applicants Timeline: Immediate and ongoing</p>	
2	127	Track A application volumes have been low and have had high levels of cancellation. At the time of reporting 20 Track A applications have been submitted, half of which have been cancelled, and only 2 Track A applicants have received a Solar Feasibility Assessment. Use of the Online Bidding Tool has also been low with only 3 applicants using it to date.	2A. Improvements to Track A Solar Feasibility Assessments. The SOMAH PA should update the solar feasibility assessments to provide additional clarity on the ownership options available (including the costs and benefits of each type) and ensure the studies present offerings property owners are likely to find in the market from program contractors.	Accept	<p>PA Response: The SOMAH PA will reevaluate and make targeted improvements to the Track A Solar Feasibility Assessments in Q1 2022, and will plan to roll out the updated assessments with additional clarity on the various ownership types available within the market, along with cost benefit analyses, with the expanded TA services in Q2 2022.</p> <p>Stakeholders: SOMAH Contractors, particularly those using modified or proprietary ownership models, such as Solar Services Agreements Timeline: Q2, 2022</p>	
			2B. Improvements to Online Bidding Tool. The SOMAH PA should ensure the bid timeline is sufficient to ensure contractors are able to submit high quality bids and should modify the bidding tool to allow contractors to submit bids for multiple ownership types.	Other	<p>PA Response: The SOMAH PA is planning to extend the Track A timeline to allow more time for the bidding process, which will require a Handbook modification. The SOMAH PA will include this program modification in version six of the program Handbook (Q3 2022).</p> <p>Additionally, integrating an apples-to-apples comparison of multiple ownership types is not possible without a substantial overhaul to the bidding tool platform. However, contractors can submit two versions of the standard bid template for property owners to review should they be interested in multiple ownership types. The SOMAH PA will conduct outreach on this feature to increase contractor awareness in Q2 2022.</p> <p>Stakeholders: Applicants, Property Owners, and Contractors Timeline: Q2-Q3, 2022</p>	

3	128	More than 1/4 of applications are for properties located in a DAC. SOMAH eligible contractors located near DACs appear to be limited. Insufficient contractors available to install solar in DACs could be a barrier to SOMAH's goal of increasing DAC participation.	3A. Expand and/or activate the pool of contractors serving DACs. The SOMAH PA should continue to focus on discovering and eliminating barriers for small and diverse contractors to encourage program participation.	Accept	<p>PA Response: The Phase II eval report validates that there are significant barriers for solar contractors to expand their businesses to participate in the multifamily affordable housing market segment, including robust dedicated staffing. The SOMAH PA is currently focusing on both activating the pool of currently participating contractors and expanding the pool of new contractors in underserved and unrepresented areas, this includes contractors that represent minority- and women-owned businesses. These efforts will continue in 2022 and will focus on 1) providing resources and training to existing contractors to help them become primary or subcontractors; 2) conducting targeted outreach to minority and women-owned contractors, as well as contractors in DACs and the Central Valley; and 3) improving contractor marketing materials and website content. This work will span across the year of 2022, with targeted research starting in Q3, 2021. The program's 2022 ME&O* Plan provides further detail on planned contractor engagement work, including direct emails/calls, social media campaigns, and at least one advertisement in a diverse contractor association or publication.</p> <p>The SOMAH PA is collecting information from contractors and subcontractors through surveys and focus groups to identify barriers to participation. This will help us identify how to motivate contractors to seek projects in DACs, and determine how to help contractors in DACs participate in the program. The SOMAH PA will hold at least one focus group composed of nonparticipating contractors and/or subcontractors to identify barriers and challenges to participation by Q2 2022.</p> <p>Stakeholders: Participating and non-participating contractors Timeline: Q1-Q4, 2022</p> <p>*The 2022 MEO plan undergoes its own review process which as of this writing is in development. Whatever ME&O plan content referenced in this document is dependent on the plan's review and approval. High-level milestones of engagement for each audience will be noted in both the SAPR and ME&O plans going forward.</p>
4	128	Participation has been dominated by multi-application property owners. To date, 65% of SOMAH applications were submitted by 14 property owners who each submitted 10+ applications. Only 5% of applications were submitted by single application property owners.	4A. Provide additional support to smaller or newly participating property owners. These applicants may need additional assistance from the SOMAH PA to successfully move through the application process.	Accept	<p>PA Response: The SOMAH PA will expand program TA services, which will include services geared toward further supporting smaller or newly participating property owners. Expanded TA offerings may include an introductory meeting for new property owners with the SOMAH PA where the TA offerings will be explained. This introductory meeting will also help to support smaller property owners by giving them additional one-on-one support for their property, as well as an overview of the SOMAH program and what they can expect by participating. Developing the relationships with the property owners (large and small) from the moment they enter the program will create a better user experience. It has the potential to identify other properties that may be eligible for the program and help smaller owners prioritize their options. The SOMAH PA will also explore how to simplify the TA process and how to message TA services to ensure clarity and awareness on what the program has to offer. Expanded TA services will be rolled out for both Track A and Track B participants.</p> <p>The planning and re-design of the TA services will take place Q1-Q2 2022, with the launch planned for the end of Q2 2022.</p> <p>Stakeholders: Property Owners Timeline: Q1-Q2, 2022</p>
5	128	SOMAH Program eligibility currently excludes properties that could benefit from SOMAH. These properties include individually metered properties where the property owner pays the utility bills, properties with existing solar, and other properties serving low-income residents that are located within a DAC.	5A. Examine SOMAH's eligibility criteria to identify modifications that could extend the program's reach.	Accept	<p>PA Response: The SOMAH PA will examine potential options to expand eligibility in the program, including master-metered properties, new construction, youth/senior housing, farmworker housing, and housing for people who have experienced homelessness. However, because the use of Virtual Net Metering (VNEM) is a legislative requirement, expanding eligibility to master metered properties, along with properties where the property owner pays the utility bills, will require additional legislation. This will also require a method to ensure direct financial benefit for tenants, outside of VNEM solar credits. The PA's approach may also depend on the outcome of the CPUC's NEM 3.0 proceeding. This work will kick-off in Q3 2022.</p> <p>Stakeholders: CPUC and its advisory bodies such as the DAC-AG and/or Low Income Oversight Board, SOMAH Advisory Council, CBOs, Property Owners Timeline: Q3, 2022 and beyond</p>
			5B. Provide additional upfront project assistance to contractors to identify ineligible projects sooner. Helping contractors determine project eligibility sooner, potentially through a SOMAH PA "pre-screen", could minimize wasted time for both property owners and contractors.	Accept	<p>PA Response: In Q2 2022, the SOMAH PA will assess the success of the informal eligibility review offered via email at the request of Applicants (mentioned in 1A) to determine the value and success of that effort. Based on that information and the recommendations in the evaluation, the PA will explore a process to formally prescreen/evaluate project eligibility prior to the larger time investment of submitting</p>

					<p>an application. This may include reviewing the deed restriction and/or developing an eligibility checklist for a prescreening call with the SOMAH PA staff. It is important for the PA to consider the volume and commitment of a formalized prescreening process and the appropriate way to conduct those efforts - data collection, request/queue management, communication methods, etc.</p> <p>Stakeholders: Applicants and Property Owners Timeline: Q2, 2022</p>
6	129	Diversity of participating contractors is low due to the complexities and burdens of participation. Only 11 of the 118 eligible SOMAH contractors have submitted an application. A single contractor accounts for 2/3 of submitted applications; 4 contractors have submitted 94% of all applications. Participating contractors tend to be large (employing > 250 people) and lack ownership diversity (women or minority owned).	6A. Increase SOMAH PA program support for subcontractors. The SOMAH PA can increase contractor diversity in the program by helping small contractors identify subcontracting opportunities on SOMAH projects. This provides subcontractors with program experience increasing likelihood of submitting future applications and ensuring program contracting opportunities are dispersed amongst a diverse set of contractors.	Accept	<p>PA Response: The SOMAH PA will hold interviews in Q1 and Q2 of 2022 to better understand subcontracting on SOMAH projects. Interviews will be held with participating contractors that have utilized subcontractors (on SOMAH projects that are post-installation) and those corresponding subcontractors. The PA will use these interviews to learn if subcontracting is a viable pathway to increase diverse contractor participation, especially amongst smaller contractors that are struggling to be prime contractors.</p> <p>If these interviews show subcontracting to be a valuable mechanism to increase contractor diversity, the PA will implement mechanisms to increase subcontracting. The PA sees subcontracting as a pathway for more contractors to participate in SOMAH and is committed to supporting contractors and subcontractors.</p> <p>Starting in Q1 2022 the PA will reach out to prime contractors on applications that reach reservation request approval to ask if they are interested in using subcontractors for their applications. Simultaneously, the PA will reach out to eligible non-participating contractors to see if they are interested in subcontracting. The PA will facilitate connections between respondents that are interested in subcontracting.</p> <p>Stakeholders: Non-participating contractors and participating subcontractors, prime contractors already utilizing subcontractors on SOMAH Timeline: Q1-Q2, 2022</p>
			6B. Track diversity of subcontractors. Requiring program contractors to track subcontractor use and diversity status will help to assess the full extent of contractor diversity in the program.	Reject	<p>PA Response: The SOMAH PA currently collects demographic information on installation subcontractors.</p> <p>Stakeholders: N/A Timeline: N/A</p>
7	129	SOMAH Program awareness was reported to be primarily from prior program participation or contractor outreach. Most participating property owners were aware of SOMAH before it launched due to their participation in previous solar or solar thermal programs or prior relationships with program contractors.	7A. Increase SOMAH co-marketing with IOUs, CCAs, or other local government organizations. The SOMAH PA should ensure sufficient co-marketing of the program with trusted organizations (including IOUs) that lend credibility to the program. Increasing local government program interactions can improve project permitting and draw positive attention to property owners helping to achieve local sustainability goals. Increasing marketing from trusted organizations and leveraging their outreach channels can raise program awareness, knowledge, and trust amongst their membership.	Reject	<p>PA Response: The SOMAH PA has already increased marketing with IOUs, CCAs, or other local government organizations in 2021. The program's 2022 ME&O Plan provides further detail on expanded stakeholder engagement, including presenting about SOMAH at local government events (ie. Local Government Commission Forum, IOU/REN workshops), comarketing SOMAH and local government, IOUs, and CCAs on social media, continuing to update the stakeholder toolkit on the program website, and presenting or co-hosting webinars with stakeholders.</p> <p>Stakeholders: SOMAH IOUs, CCAs, Regional Energy Networks or RENs, multi government groups including the Local Government Commission Timeline: Ongoing in 2022</p>
			7B. Raise SOMAH Program awareness within city and county housing authorities. The SOMAH PA should ensure ME&O activities targeting housing authorities are sufficient to raise awareness and increase participation amongst these entities.	Other	<p>PA Response: The SOMAH PA has already done targeted outreach to city and county Housing Authorities in 2021. In 2022, the SOMAH PA will continue to focus on direct outreach to active Housing Authorities that participate with TCAC, specifically identifying those that have the capacity to manage solar projects. The program's 2022 ME&O Plan provides further detail on planned stakeholder work, including conducting direct outreach to housing authorities, developing case studies from participating owners to illustrate the benefits of SOMAH, identifying, and coordinating with new co-marketing partners to market the program, and gathering feedback from housing authorities with active LIHTC projects to improve outreach strategies. Additionally, the SOMAH Advisory Council recently added a new member who represents a Tribal Housing Authority, to support engagement with other tribal housing entities.</p> <p>Stakeholders: Housing Authorities Timeline: Ongoing in 2022</p>
			7C. Utilize case studies to showcase and promote completed SOMAH projects. Case studies illustrating the benefits SOMAH provides to property owners and tenants can build trust in the program via testimonials from peers within the affordable housing community. Case studies should	Other	<p>PA Response: The SOMAH PA has already started developing case studies in 2021 and will continue to develop additional case studies in 2022 as outlined in the 2022 ME&O Plan*. The SOMAH PA is collecting data for case studies, along with gathering testimonials and quotes via interviews from various program participants, including property owners, contractors, tenants and job trainees - through ribbon-cutting</p>

			highlight participating organizations of all sizes from small single site property owners to large affordable housing developers.		<p>events or other types of engagements, such as video conference call interviews. With dozens of projects scheduled to close out in Q1-Q2 of 2022, there will be plenty of opportunities for the SOMAH PA to develop case studies on properties as well as developers ranging in size. These case studies will be written and distributed through SOMAH’s outreach channels, amongst stakeholders, and contractors to highlight successes and benefits.</p> <p>Stakeholders: Property owners, contractors, tenants, and job trainees from completed SOMAH projects Timeline: Initial case studies: Q2, 2022, additional studies: Q4, 2022</p>
8.1	64	<p>Property Owner Barriers: #1: Not their top priority. Affordable housing organizations #1 priority is to house people. Solar as a “nice to have,” but competes with other important organization priorities such as tenant job placement and training, mental health services, and COVID assistance. #2: Lack of staff to manage a solar installation project. Many property owners do not have adequate staff available to manage a lengthy and complex solar program application and installation project. SOMAH was viewed as administratively burdensome #3: Property owner organizational structure. Affordable housing developers are often structured such that one division of the organization is focused and skilled in construction and construction management, and a different division is focused on asset management. Many SOMAH-eligible properties fall under the jurisdiction of the asset management division which is less capable (from a skill sets and bandwidth perspective) to manage a major construction project such as SOMAH.</p>	<p>Expanded technical assistance offering such as: 8A. Services to augment property owner staff capacity. The SolSmart Program funded by the U.S. Department of Energy Solar Energy Technologies Office (www.solsmart.org) helps local governments and regional organizations install solar, “our goal is to make it faster, easier, and more affordable to go solar.” The SolSmart Program has a SolSmart Advisors offering that provides “fully-funded, experienced staff recruited to help communities achieve designation.” SolSmart Advisors can be embedded within an affordable housing organization to provide additional short-term staffing capacity to help navigate the application process. The SOMAH program should investigate their ability to mimic the SolSmart Program’s embedded advisor offering.</p>	Other	<p>PA Response: The SOMAH PA believes the expanded offerings for TA services (referenced in response to 4A) is the best initial step to address this recommendation. While the PA believes the design and implementation of an offering similar to SolSmart Advisors could be beneficial for the program, due to the time and cost associated with a full rollout of a new offering as suggested, the PA proposes an alternative solution. Instead, the PA sees the expanded TA offerings where there is already a similar role of the Energy Project Manager (EPM) as a swift and existing way to support this program need through Technical Assistance. The PA will consider the need for an advisor similar to SolSmart in 2023 should the need persist.</p> <p>The planning and re-design of the TA services will take place Q1-Q2, 2022, with the launch planned for the end of Q2, 2022.</p> <p>Stakeholders: Property Owners Timeline: Q1-Q2, 2022</p>
			<p>8B. Services to assist with LIHTC applications. The LIHTC resyndication process is quite complex but additional technical assistance on how to leverage both LIHTC and SOMAH funding to get solar projects approved may be beneficial. The SOMAH PA may be able to assist properties going through re-syndication and create a robust proposal to bring to the LI—C—improving their likelihood of getting the funds needed to offset any non-SOMAH covered expenses.</p>	Other	<p>PA Response: It is out of the SOMAH PA’s scope to assist property owners with submitting their LIHTC applications. However, the SOMAH PA is exploring how to best support leveraging SOMAH alongside the LIHTC application. There may be some option through expanded TA offerings, along with an expanded Track A timeline (6-12 months) for properties applying for TCAC to incorporate solar into their planned TCAC rehabilitation. The SOMAH PA will explore these options through the development of expanded TA (Q1-Q2 2022) and will request any needed modifications in version six of the Handbook (Q3 2022).</p> <p>Stakeholders: Properties going through LIHTC re-syndication Timeline: Q1-Q3, 2022</p>
8.2	65	<p>#4: Project financing, primarily up front and out of pocket costs, was a primary barrier for most property owners. Inability to figure out project financing is also leading to project cancellations. Many SOMAH projects planned to utilize a PPA ownership type to eliminate out of pocket costs and/or the need to secure bridge financing to cover project costs prior to receiving the SOMAH incentive. Property owners using HCO and PPA models reported trying to find the optimal balance between maximizing program incentives (by increasing tenant space allocations which receive higher incentives) and saving enough money on common area bills to cover their SOMAH monthly costs (PPA and HCO) and ongoing maintenance costs (HCO only). In 2021 the SOMAH PA rolled out the Progress Payment Pathway to ease some of the project financing burden. Contractors reported this helped somewhat but the first progress payment was still paid out very late in the project timeline.</p>	<p>8C. Bridge loan assistance. The SOMAH PA is looking into whether SOMAH could engage a bridge loan provider who could assist contractors or property owners to cover gaps in funding from the start of the application process until the SOMAH incentive is paid. It may also be possible to leverage the millions of SOMAH dollars that are currently not reserved to serve as bridge loans for participants. However, the SOMAH PA currently is not set up to facilitate such transactions and does not have the legal staffing required if funds are not paid back. Other financial tools are being investigated by R.20-08-022 which could help SOMAH participants address the project financing barriers.</p>	Reject	<p>PA Response: The PA rejects the recommendation to use unreserved program funds for bridge financing because: a) using SOMAH funds as bridge loans is not allowed under current program guidelines and would require the CPUC to permit this; b) using SOMAH funds as bridge loans would present a tremendous risk to the program, given the potential for loss of program funds; and c) using SOMAH funds as bridge loans and subsequent recovery of lost program funds would require legal investigation. Several key stakeholders’ concerns and protests regarding a potential loss of program funds were documented in comments to the SOMAH PA’s Advice Letter concerning Progress Payments (CSE-AL-118), for example, informing the design of that offering, and requirement that no incentive funds be paid or provided by the program until the project demonstrated mechanical completion.</p> <p>However, the SOMAH PA fully supports increasing funding opportunities and has received feedback from property owners and contractors about this issue. In response, the PA has already contacted three (3) bridge loan financing providers as potential venues for financial support for SOMAH projects through bridge loan offerings. The PA is planning to promote the partner loan providers through the program channels (website, listserv, public forum, etc.) to raise awareness around their services and how they can be paired with SOMAH. The PA is optimistic that these loan providers and the potential for future providers partnering with the program will meet the need that this recommendation is trying to address.</p> <p>Stakeholders: Property owners, contractors, bridge loan providers Timeline: Bridge-loan provider outreach will be ongoing through 2022</p>
8.3	66	<p>#5 Distrust in solar contractors marketing the program. Some affordable housing organizations have a cultural fear of someone who is trying to “sell” them something. There is distrust that “free solar” is too good to be true and organizations can be confused or worried that solar contractors are trying to cheat them. This skepticism is leading some property owners to approach the program cautiously and often limits the number of</p>	<p>8D. Additional third-party nonbiased project support. The SOMAH PA is currently reviewing what additional technical assistance services could be offered to ensure property owners have the program knowledge they need to feel secure in their participation decision making. Getting information through a CPUC-sponsored third-party (such as the SOMAH PA, as opposed to the SOMAH contractor which currently provides the majority of SOMAH information to property owners) who has no financial stake in the SOMAH project could potentially increase their confidence in the participation process. Similar services are currently provided to Track A participants, but less so to Track B</p>	Accept	<p>PA Response: The SOMAH PA will expand its current TA offerings to provide this level of non-biased support to property owners, similar to what was referenced in response to 4A. These efforts may include an introductory meeting for new Track A and Track B property owners with the SOMAH PA where the TA offerings, along with the process to sign up, will be explained.</p> <p>Stakeholders: Property owners, contractors Timeline: Q1-Q2, 2022</p>

		<p>applications they initially submit so they can “test the waters.” The distrust seems to be minimized for organizations having existing relationships with a solar contractor through previous solar projects on new construction or retrofit properties. For some there is a lack of confidence that the program will work as advertised. While current utility bills can be substantial for affordable housing organizations, they are a known and understood reality—whereas solar, which may be a better alternative, is an unknown. Effectively breaking down this barrier needs to come from trusted sources within the affordable housing community. Developing and publicizing SOMAH case studies that explain and document real examples of how other organizations have participated, as well as increased program outreach from affordable housing trade organizations could provide credibility and increase trust in the program and the SOMAH eligible contractors.</p>	<p>participants who primarily interact with and get information through their SOMAH contractor. These services could be provided to Track B participants through SOMAH's existing Standard TA offering – however this would require that Track B participants were made aware of how to request Standard TA.</p>		
			<p>8E. Increase co-marketing with IOUs or local governments. Some property owners reported their limited knowledge or awareness of SOMAH has come from a contractor. While the SOMAH PA currently markets the program through a number of channels, property owner’s awareness of the SOMAH PA’s co-marketing of the program with entities that affordable housing organizations are very familiar with is low. One member of the SOMAH PA reported their organization has had past success by co-marketing new lesser-known programs (such as SOMAH) with IOUs or local governments as those entities can lend credibility to the program so they are taken more seriously. The SOMAH PA has discussed this with some of the IOUs but have received resistance as the IOUs do not have a marketing budget. Additionally, increasing local government’s interaction with the program could potentially help to improve the difficult permitting process experienced in some locations, and also draw positive attention to the property owners installing solar - spotlighting them for their role to help the community make progress towards their local sustainability goals.</p>	Reject	<p>PA Response: The SOMAH PA already prioritized increased comarketing marketing with IOUs and local governments in 2021. These comarketing efforts will continue in 2022 as outlined in the program's 2022 ME&O Plan. Planned engagement will include presenting about SOMAH at IOU program workshops, continuing to update the stakeholder toolkit on the program website, and co-hosting webinars with IOU programs. High-level milestones of engagement will be noted in both the SAPR and ME&O plans going forward.</p> <p>Stakeholders: IOUs Timeline: Ongoing in 2022</p>
8.4	68	<p>#6: Property physical site issues. Many property owners faced barriers related to physical aspects of either their buildings or properties. These barriers included items such as issues relating to the age or condition of the roof, adequacy of space available for solar panels, and site level construction logistical issues.</p>	<p>8F. Expand allowable expenses that can be paid for with program incentives. Expanding the project related expenses that program incentives can be used for can help property owners find ways to participate in the program.</p>	Other	<p>PA Response: While the SOMAH PA can look into expanding eligible expenses, it will likely not address the issue these properties are facing. There are very few active projects that have had their incentive capped due to project costs, meaning that eligible project costs have been greater than the project incentive for the vast majority of the applications in the program. If the incentive is already lower than the total project costs, expanding eligible costs will have no effect on the total incentive amount. To address this issue faced by property owners, incentive levels will need to be examined, alongside expanding the eligible project costs.</p> <p>Stakeholders: Property Owners and Applicants Timeline: Ongoing in 2022</p>
			<p>8G. Ensure SOMAH eligibility does not unfairly penalize “early adopters”. Program rules should be reviewed to ensure the population of eligible properties is maximized and properties that have old and outdated systems that are at the end of their life can be replaced with newer SOMAH systems that have significantly larger capacities and can provide maximum benefits to low-income tenants.</p>	Other	<p>PA Response: In 2022, the SOMAH PA will review the current program guidelines to ensure the program is not penalizing early adopters. From the existing applications, it is the SOMAH PA’s understanding that “early adopters” are not being penalized, but the PA will need more information from Applicants and Property Owners to better understand the full impact of existing systems and potential removal. If program Handbook modifications are needed, the SOMAH PA will request the updates in version six of the Handbook (Q3 2022). The PA does not want to work at odds with other programs' permanency requirements, and where possible, would prefer SOMAH playing an additive role rather than replacing installed capacity already out there, as intended.</p> <p>Stakeholders: Property Owners Timeline: Q1-Q3, 2022</p>
8.5	69	<p>#7: Application burden and Property ownership structure. Many affordable housing organizations own numerous properties within their portfolio and typically each of these properties functions as its own corporation or Limited Liability Partnership (LLP). Each property can have a unique set of rules it must abide by and distinct partners who need to approve participation in programs like SOMAH. What is allowable can vary from property to property and must be reviewed and approved separately for each entity. This unfortunately limits the scalability and efficiency of submitting numerous applications across a portfolio as each application must go through its own participation and approval process.</p>	<p>8H. Property owner project dashboard. Many property owners have submitted multiple project applications and can be overwhelmed trying to track the current status of each of the applications. One property owner reported having difficulty tracking project issues and reporting project status to senior management due to the number of applications that have been submitted and the lack of a clear and concise reporting tool. Having access to a project dashboard would be a “game changer” and would ease the burden of participation experienced.</p>	Other	<p>PA Response: There are already filtering and reporting features in PowerClerk that could meet this need for property owners but may not be known or understood by participants. By Q2 2022, the SOMAH PA will incorporate a PowerClerk walkthrough into an introductory call with new property owners and will reach out to existing property owners to confirm their awareness of existing PowerClerk capabilities and gauge their interest in a potential dashboard feature.</p> <p>Stakeholders: Property Owners Timeline: Q2, 2022</p>
			<p>8I. Property owner email opt-out. Participating contractors take the majority of the participation burden off of property owners. Property owners, however, can still be burdened by the large number of emails that are exchanged between the SOMAH PA, the contractor, and the property owner. Many of these emails are discussing issues with an application submittal or documenting a timeline extension and will be handled directly by the contractor. If the property owner needs to be involved the contractor will communicate directly with them detailing specifically what they need to do. As such, giving property owners the ability to opt-out of non-essential emails from the SOMAH PA will likely lessen the burden and confusion they currently experience.</p>	Other	<p>PA Response: The SOMAH PA is assessing the functionality (PowerClerk parameters) of a formal opt-out option for property owners to opt-out of non-essential program communications. However, there are essential program communications that the property owner will be required to be copied on for consumer protection. The PowerClerk functionality considerations are related to the automated processes that have already been built out for the application process to ensure quality control, efficiency, and consistency. Additionally, the SOMAH PA is reviewing all program communications to determine if any communications can be removed to reduce administrative burden, as well as verifying that only the essential parties are included on each message. The SOMAH PA will plan to complete this exploration in Q1 2022 and implement any changes in Q2 2022.</p> <p>Stakeholders: Applicants and Property Owners Timeline: Q1-Q2, 2022</p>

9	130	<p>Contractors' primary barriers to participation are administrative in nature. SOMAH Program rules and participation and documentation requirements are onerous, present a significant administrative burden to contractors and as a result are a barrier to participation. Participating contractors typically require large, dedicated teams to manage SOMAH projects, including sales, project management, engineering, and construction staff. Filling this multitude of roles can be difficult for small contractors. Non-participating contractors reported difficulty generating project leads and confusion over program requirements and the application process. Contractor barriers also include financial and solar feasibility concerns, such as property owners' inability to cover up front costs or secure bridge funding. Contractors also reported difficulties carrying project costs for extended times prior to incentive payment.</p>	<p>9A. SOMAH PA support services to assist with application submittal. The SOMAH PA could consider providing services to assist contractors or property owners by completing or prefilling portions of the application and helping with other time-consuming steps such as researching local zoning codes (that could significantly impact project plans), acquisition of property billing data, or assistance with project permitting.</p>	Other	<p>PA Response: To address the recommendation of services to assist with application submittal, the SOMAH PA will be expanding TA services (Q2 2022) for the program. The PowerClerk application portal has been designed with user experience in mind with the intent that the information carried over after subsequent milestones is partially "pre-filled" after an initial submission. Additionally, the initial submission requirements for Track A projects have been adjusted to allow property owners the flexibility to submit with what they have at the time and utilize the PA's application support services to navigate the full requirements and alleviate the initial admin burden.</p> <p>The expanded TA services are intended with the goal to include application support and requests for property consumption data. The PA's commitment to this offering is reliant on cooperation from the IOUs, who have previously expressed concern around allocating IOU time and budget to pull consumption data before the project is deemed eligible for the program. As a result, the SOMAH PA has had a limited scope when requesting billing consumption data from the IOUs to only projects with confirmed eligibility (application submitted). With support from the IOUs the SOMAH PA can integrate offerings for consumption data into TA services.</p> <p>The SOMAH PA encourages contractors to recruit SOMAH job trainees for non-installation work, including permitting, through program communications, webinars, and one-on-one calls (ongoing). The SOMAH PA does not have the bandwidth or scope to support efforts for local zoning codes or permitting at this time but feels that job trainees would greatly benefit from this type of work which would support the contractor and property owners needs while meeting the program's job training requirements.</p> <p>The SOMAH PA also appreciates the importance of streamlined permitting for the efficient functioning of the solar market. In Q1 2023, The SOMAH PA may explore programs like the U.S. Department of Energy-funded SolSmart, which provides technical assistance to local governments to help reduce barriers to deployment, including planning and zoning, permitting and inspections, and other enabling actions to make it easier to go solar within their jurisdictions.</p> <p>Stakeholders: Contractors, Property Owners, and Job Trainees Timeline: Q1-Q2, 2022</p>
			<p>9B. Reassess and update SOMAH Eligible Properties Map to include accurate estimates of the solar project which is helpful to contractors who use these data to target eligible properties.</p>	Reject	<p>PA Response: The SOMAH PA included solar potential estimates on a previous version of the eligible property map but removed them after an internal capacity analysis on projects and system size potential for the program made it clear that the estimates were inaccurate and caused additional confusion with map users. Estimates were based on limited factors and high-level data as opposed to project-specific site conditions, which are required to create an accurate estimate.</p> <p>In order to include more accurate estimates, the PA would have to evaluate and do a pre-design for approximately 3,400 potentially eligible properties, which would take a significant amount of time and budget. The PA does not want to misrepresent potential SOMAH properties and encourages property owners to utilize the TA service like the TA lite report to fully assess the solar potential for their property.</p> <p>Stakeholders: N/A Timeline: N/A</p>
			<p>9C. Provide additional workforce development support to contractors to help them meet program job training requirements and broaden the pool of job trainees.</p>	Reject	<p>PA Response: The SOMAH PA is already implementing this recommendation, with input on strategies and direct implementation support from WFD partner Rising Sun as well as the SOMAH Job Training Organization Task Force. A key aspect of the program's support involves the SOMAH PA, Rising Sun, and the JTO TF working directly with contractors to matchmake eligible trainees to their projects, sometimes on expedited timelines, to ensure JT requirements are met and that contractors are supported in the process. This alleviates a significant burden on the contractor as it relates to trainee recruitment, and the SOMAH PA will further formalize and market this service by the end of Q2 2022. Rising Sun will also continue its ongoing work in 2022 to add additional eligible Job Training Organizations to our directory and engage those programs and institutions to inform their students/trainees of the SOMAH JT opportunity. The program's 2022 ME&O Plan* provides further detail on planned contractor engagement for job training, including hosting webinars, conducting a workforce needs assessment, and launching and marketing the Resources page on the Job Training Portal.</p> <p>Stakeholders: N/A Timeline: N/A</p>
			<p>9D. Research feasibility of leveraging SOMAH unreserved incentives help contractors address financial barriers. The SOMAH PA should, in coordination with the CPUC, research how the \$260M in</p>	Other	<p>PA Response: While the SOMAH PA does not accept the recommendation to use unreserved funds for bridge loans as mentioned in 8C, we agree that there is potential in considering other ways to leverage incentive funds to support contractors and property owners. The SOMAH PA will plan to start this</p>

			unreserved incentives could be leveraged to help contractors and property owners cover projects costs prior to incentives being paid.		<p>research in Q4 2022, in coordination with Energy Division staff. By Q4 2022, the expanded TA services and the new program website will be fully launched and live for at least three months. Further, the SOMAH PA should have cemented relationships with bridge loan providers. By Q4 2022, the SOMAH PA and Energy Division will be able to determine if the planned modifications are sufficient, or if additional financing is needed from the unreserved incentives.</p> <p>Stakeholders: Property owners, contractors, bridge loan providers, CPUC Timeline: Bridge-loan provider outreach will be ongoing through 2022</p>
			9E. Clarify allowable expenses that can be paid for with program incentives. Program incentives can be used to cover project costs including financing, construction management, and project development costs. Ensuring contractors understand allowable expenses may reduce the financial barriers to participation, help more properties submit applications, and reduce project cancellations.	Accept	<p>PA Response: The SOMAH PA will review training content on allowable expenses (Q1 2022) and will provide additional content/resources and communications to increase awareness (Q2 2022), in addition to response to 8F.</p> <p>Stakeholders: Contractors and Applicants Timeline: Q1-Q2, 2022</p>
10	132	Project cancellations were highest amongst property owners submitting few applications. These applicants may be less familiar with program eligibility requirements or have limited capability to manage a solar installation project and thus may need additional assistance from the SOMAH PA.	10A. After a reservation request has been submitted for a new project, it would be beneficial for the SOMAH PA to schedule a meeting with the property owner to discuss program rules, eligibility requirements, and to answer questions they have about program participation. Building a relationship between the SOMAH PA and the property owner can help the PA identify participation challenges that arise and that can potentially be solved through PA intervention and assistance. Receiving feedback early, prior to project cancellation, may reduce the volume of projects cancelled.	Accept	<p>PA Response: As outlined in reply to 4A, the SOMAH PA's expanded TA offerings may include an introductory meeting for new property owners to give them additional one-on-one support for their property, as well as an overview of the SOMAH program and what they can expect by participating. Developing the relationships with the property owners (large and small) from the moment they enter the program will create a better user experience and has the potential to identify other properties that may be eligible for the program and help smaller owners prioritize their options. The planning and re-design of the TA services will take place Q1-Q2 2022, with the launch planned for the end of Q2 2022.</p> <p>Stakeholders: Property Owners Timeline: Q1-Q2, 2022</p>
11	132	Most participating contractors have HCO projects and only 2 have PPA projects which may indicate PPA difficulty for some contractors. Many property owners reported PPA ownership was essential to their participation in SOMAH as it eliminated upfront out of pocket costs and ongoing O&M costs.	11A. The SOMAH PA should identify what assistance they could provide to eligible contractors to allow them to offer all ownership options (HCO, PPA and Solar Lease) to potential SOMAH property owners.	Reject	<p>PA Response: While the SOMAH PA is invested in lowering barriers through highlighting relevant loan providers and products without endorsing them, a contractor's ability to sustainably offer third-party owned finance options entails sophisticated legal and financial capacity and partnerships, which is largely beyond the scope of the program and the PA's control.</p> <p>From conversations with contractors, it is the PA's understanding that the ownership types offered are likely tied to their business model and preferred business practices. However, the PA is encouraged by feedback that a participating contractor is willing to share their financing model with others in support of expanded third-party ownership options across other contracting companies.</p> <p>Stakeholders: N/A Timeline: N/A</p>
12	133	Determining project financing and ownership is one of the most difficult and time-consuming components of SOMAH participation for contractors and property owners. Contractors provide property owners with information on project payback, energy and out of pocket costs over the life of the system, and cost comparisons between HCO and PPA ownership.	12A. The SOMAH PA should assess ways in which they can lessen the project financing barriers faced by property owners and contractors by offering additional financing support. This could include additional technical assistance offerings to help smaller contractors provide third-party ownership options or examining ways to make HCO feasible for property owners via bridge loan or low-interest financing support for the SOMAH projects.	Accept	<p>PA Response: The SOMAH PA accepts this recommendation and has recently participated in a number of introductory planning calls with providers of financial services and products, specifically around gap or bridge loan assistance. These efforts will be further encouraged by the expanded TA services referenced in earlier responses. The PA will not endorse the services of any particular entity but will provide objective information on a number of relevant products and service providers via CalSOMAH.org and throughout its owner and contractor engagement work. The SOMAH PA is hoping to cement relationships with at least three gap or bridge loan providers by the end of Q1 2022.</p> <p>Stakeholders: Property Owners and Bridge loan providers Timeline: Q1, 2022</p>
13	133	Not all participating property owners were aware of all available ownership options. Some property owners reported not knowing about PPA ownership, the financing implications associated with various ownership types, nor the fact the leveraging tax credits reduces SOMAH incentive levels. There was also confusion amongst parties regarding the difference between a PPA and an SSA (Solar Services Agreement).	13A. Scheduling a meeting between the SOMAH PA and the property owner could have many benefits including a review of SOMAH ownership options and the proposal they received from their contractor to ensure they are making a fully informed decision. This meeting would also allow the SOMAH PA to get an understanding of any additional properties owned or managed by the property owner that may be eligible for the SOMAH program.	Other	<p>PA Response: As outlined in reply to 4A, the introductory meeting for new property owners is to give them additional one-on-one support for their property, as well as an overview of the SOMAH program and what they can expect by participating. This introductory, or welcome call, also has the potential to identify other properties that may be eligible for the program and help smaller owners prioritize their options.</p> <p>While we can help property owners understand the available financing options to pay for installation costs that are not covered by SOMAH incentives and provide educational resources and answer key questions about different system ownership options such as a cash purchase, PPAs and solar leases, the</p>

					<p>SOMAH PA will not recommend financing options, review bids, or request that owners rethink their options as a part of this introductory call.</p> <p>The planning and re-design of the TA services will take place Q1-Q2 2022, with the launch planned for the end of Q2 2022.</p> <p>Stakeholders: Property Owners Timeline: Q1-Q2, 2022</p>
			13B. Update the SOMAH Handbook to include Solar Services Agreements (SSA). To address confusion regarding SSA offerings, including those in the Track A Technical Assistance materials, the SOMAH PA should review program materials to ensure they clearly present all available ownership options (including SSAs), and expand explanations of the benefits various ownership types provide to properties owners.	Accept	<p>PA Response: The SOMAH PA will include SSAs as a third-party owned option for SOMAH projects in the proposed fifth edition of the Handbook (Q1 2022) and as an option in the PowerClerk application once the Handbook is approved.</p> <p>Stakeholders: Contractors and Property Owners Timeline: Q1, 2022</p>
14	134	Project timelines have been long with few projects completed to date due to a long application and installation process exacerbated by COVID-19 and permitting related delays.	14A. Assist contractors with the acquisition of property electrical consumption data. Contractors reported challenges acquiring building consumption data sufficient for the creation of project proposals. Ensuring contractor consumption data aligns with the IOU data request can reduce contractors need to redo project designs and bids and shorten project timelines.	Accept	<p>PA Response: Similar to the reply for 9A, the SOMAH PA will explore a process for applicants to request consumption data outside of the application process while adhering to SCE's customer privacy regulations, with whom the SOMAH PA holds a contract. The PA's commitment to this offering is reliant on cooperation from the IOUs who have previously expressed concern in the past around allocating IOU time and budget to pull consumption data before the project is deemed eligible for the program. This means the SOMAH PA has had a limited scope when requesting billing consumption data from the IOUs will need to determine a process to only projects with confirmed eligibility (application submitted). With support from the IOUs the SOMAH PA can integrate offerings for consumption data into TA services.</p> <p>Stakeholders: Property Owners and Contractors Timeline: Q2, 2022</p>
			14B. Offer greater support to streamline project permitting process. Project permitting varies significantly across municipalities and can be problematic for all solar installations. Legislation recently introduced to streamline permitting in California for standard residential PV systems (SB 617) may also streamline the process for SOMAH projects. The SOMAH PA should closely follow SB 617 to ensure it includes SOMAH and also implement ME&O activities that help contractors and local authorities understand best practices in solar plan review and permitting.	Reject	<p>PA Response: While the SOMAH PA understands the importance of the role streamlined permitting processes play in a successful solar project, this work falls outside of the SOMAH PA's scope.</p> <p>Stakeholders: N/A Timeline: N/A</p>
15	134	Reservation Request Approval has taken nearly nine months but is showing signs of speeding up as the program matures and experience with the program grows. The Reservation Request Package step has taken the longest to complete. Projects submitted during the first year of the program took 287 days on average to get approval—nearly 3 months longer than those submitted during the second year of the program (192 days).	15A. Consider dividing the Reservation Request Package into more manageable steps. This step establishes eligibility, affirms tenant economic benefits of solar, creates VNEM allocations, establishes consent to receive customer data/information, collects equipment and system information, and reserves project incentives. This step requires significant effort for contractors prior to being assured the project will receive an incentive. Breaking this one step into more steps can help to add certainty thus reducing the application burden. All Reservation Request documents should also be reviewed to identify opportunities to streamline program participation requirements.	Other	<p>PA Response: In Q1 2022, the SOMAH PA will re-evaluate the processing times and application requirements for the sub-steps of the Reservation Request (initial document review, data request, application deposit) to determine the greatest opportunity for time efficiency and relief for the application document burden. After assessing the time and requirements for the sub-steps of the Reservation Request, the PA will consider breaking the Reservation Request into multiple steps. While the SOMAH PA agrees that the Reservation Request Milestone is a timely and often cumbersome step in the SOMAH program, it is also an essential step in gathering accurate information to appropriately and accurately reserve incentive funds for viable and eligible solar projects. The PA would like the time to complete an in-depth review of the milestone before proposing specific changes to the Reservation Request to ensure there is adequate value in re-packaging the same requirements in a different way and to confirm if any requirements can be adjusted or removed. For example, further breaking existing milestones into smaller ones may require more emails and touchpoints within the application process, so there are multiple layers to consider that are best addressed during a sub-process review by the PA.</p> <p>Modifications to the Reservation Request process will require a Handbook change. If the SOMAH PA decides to move forward with modifications to the Reservation Request process, the SOMAH PA will request the modifications in version six of the Handbook (Q3 2022).</p> <p>As mentioned in response to 4A and other similar recommendations, the spirit of this recommendation will also be met in part by providing expanded TA services, an opportunity to request consumption data earlier on, and an informal eligibility screening. These additional services and planned modifications will all help to provide additional certainty referenced in this recommendation and ultimately support a less overwhelming Reservation Request Milestone.</p> <p>Stakeholders: Applicants, Contractors, Property Owners Timeline: Q1, 2022 and Q3, 2022 (potentially)</p>

16	134	Confusion exists regarding sizing SOMAH PV systems to account for future electrical consumption increases. Not all property owners were aware of SOMAH program rules that allow the Solar Sizing Tool (SST) to account for planned electrification activities or EV charger installations. A clear understanding of the program rules regarding system sizing may encourage property owners to make additional electrification investments to their properties that can benefit from their SOMAH solar installation.	16A. Increase education on solar sizing to include future electrification and EV charging measures. Ensure contractors and property owners understand the program rules and requirements that allow for PV systems to be sized to account for future electrification and EV measure adoption.	Accept	<p>PA Response: The SOMAH PA accepts this recommendation and will start this work by Q3 2022. This work will be done through one-on-one support as part of the introductory engagement as outlined in 4A. Additional information on these topics may be included in the program's TA services during standard TA as requested regardless of Track type. The SOMAH PA is engaging with stakeholders to encourage applicants to have completed EV, ESA, and electrification measures prior to installing solar. For participants that are not engaged with these stakeholders prior to SOMAH participation, the PA's technical assistance services are available to support navigating the program requirements, savings opportunities, and areas for expansion.</p> <p>In addition to the program outreach, the SOMAH PA will plan to work with the IOUs to identify and break down any barriers in the planning and interconnection processes. This will be completed during the SOMAH IOU Working Group.</p> <p>Stakeholders: Property Owners Timeline: Q3, 2022</p>
17	135	Plans to pair SOMAH PV with BTM storage have varied by system ownership. Roughly 92% of active PPA projects plan to pair their PV with BTM storage, whereas only 2% of HCO projects include storage in their program applications. As noted earlier, pairing BTM storage with in-front-of meter VNEM/SOMAH PV poses technical and regulatory challenges.	17A. SOMAH PA should carefully track the actual attachment rate of BTM storage with SOMAH PV systems and highlight case studies of successful implementation.	Other	<p>PA Response: The SOMAH PA already is tracking the intent to pair battery storage with PV solar through the existing application process and will work to include data around SOMAH PV systems paired with energy storage in the working dataset by Q2 2022. The SOMAH PA does not track the interconnection of related battery storage systems.</p> <p>The SOMAH PA will also plan to highlight at least one of these paired systems through a project case study in Q3 2022. However, it should be noted there are current obstacles for solar and battery storage projects for the use of resiliency for the property. These obstacles may delay the timelines for a full installation of both solar and storage.</p> <p>Stakeholders: Contractors Timeline: Q2-Q3, 2022</p>
18	135	Leveraging BTM storage with in front of the meter solar can be difficult and confusing due to VNEM Tariff requirements. Pairing BTM battery storage and IFOTM solar can pose interconnection challenges for the purposes of providing resiliency. While property owners reported being aware of SGIP battery storage incentives available, challenges leveraging SGIP incentives for SOMAH/VNEM projects exist. Further, there is uncertainty as to whether some or all utilities' VNEM tariffs preclude IFOTM storage systems on a VNEM tariff from providing power to a building's on-site load.	18A. The SOMAH PA should ensure SOMAH contractors are fully aware and knowledgeable of SGIP requirements and have the materials necessary to educate property owners on how solar and storage pairing operates and the benefits it can provide to the property. Projects may abandon plans to integrate their PV system with battery storage if rules and regulations are not changed to streamline the pairing of SOMAH VNEM systems with battery storage.	Other	<p>PA Response: The SOMAH PA sees multiple components to this recommendation, outlined here. The SOMAH PA can introduce the SGIP program during the Applicant and Contractor Eligibility Training between Q1 and Q2 of 2022. The SOMAH PA will do a warm handoff to the SGIP PA when contractors indicate their interest in solar plus storage. The SOMAH PA sees that ensuring contractors have materials to promote and explain the benefits of solar plus storage is outside of the PA's scope however, the SOMAH PA supports solar plus storage pairing. The PA acknowledges that there may be potential regulatory modifications to VNEM needed in order to support pairing SOMAH and SGIP.</p> <p>Stakeholders: CPUC, SGIP Program Administration Timeline: Q2-Q4, 2022</p>
19	135	PowerClerk tracking database is robust and effective. The SOMAH PowerClerk program tracking database is robust and effective for tracking applications through this complex program. The evaluation team's use and detailed review of this database recommends a number of updates to improve its usefulness.	19A. The variable "Ownership Type" takes the values: For-Profit, Non-Profit, or Hybrid. This field was blank for more than half of applicants and where populated seems to indicate the contractor's status not the property owner's and so is not helpful to characterize property ownership.	Accept	<p>PA Response: This field was added to the program database after program launch (early 2020), which is why it is blank for many projects. The SOMAH PA will request this field be populated during application suspensions for applications where it is missing and aim to collect at subsequent milestones where appropriate.</p> <p>Stakeholders: Property Owners and Applicants Timeline: Immediate and ongoing</p>
			19B. The PA should require the collection of all project component costs earlier in the process. Currently these costs are collected in the PPM for all projects but to date only HCO system are providing these disaggregated costs earlier in the process.	Reject	<p>PA Response: While PowerClerk has data fields for project costs starting at Reservation Request (RR), the full cost breakdown is not required until Proof of Project Milestone (PPM), when the installation contract is required to be submitted. While the program could require the breakdown of project costs to be submitted at RR, there is no way for the SOMAH PA to verify the costs until PPM when the contract is submitted. Additionally, the project costs are simply estimates until the contract is executed between the contractor and property owner.</p> <p>Stakeholders: N/A Timeline: N/A</p>
			19C. The data captured in the "Reason for Cancellation" field could be enhanced by expanding the cancellation reasons to include additional information on the underlying rationale. For example, the "Not interested in the program at this time" and "Deadline not met" do not shed light on why the	Other	<p>PA Response: In Q2 2022, the SOMAH PA will review internal notes and communications for cancelled projects and use an additional data field to elaborate, free form, on the bucketed reasons for cancellation to provide more clarity on underlying rationale where possible. After adding the additional details, the PA will explore adding additional bucketed options for the reason for cancellation in PowerClerk, along with</p>

		<p>applicant is no longer interested or did not meet the application deadline (i.e., financial reasons, lack of available staff, etc.).</p>			<p>conducting outreach to existing cancelled projects to determine the true reason for cancellation. The initial information reported by the Applicant is often vague and high level, which is part of the reason the existing information is limited. The cancellation reasons are collected and recorded by the PA staff and are not required self-reporting for cancellation.</p> <p>Additionally, the SOMAH PA will develop a plan and process for the PA staff to reach out to existing and future cancelled applications in Q1 2022. This plan will be organized and prioritized based on priority groups, existing relationships with property owners, active project portfolios, and level of detail given with reason for cancellation.</p> <p>Stakeholders: Applicants and Property Owners Timeline: Q1-Q2, 2022</p>
		<p>19D. Tracking tenant and common area rates (including CARE) pre and post installation would help ensure the accuracy of the common and tenant area bill savings estimates calculated by program evaluators.</p>		<p>Other</p>	<p>PA Response: The SOMAH PA agrees with this recommendation. However, it should be noted that the SOMAH PA is currently authorized to collect the monthly kWh consumption data, monthly bill amount (including energy and demand charges), and the NEM credits from VNEM allocation by meter number. The SOMAH PA currently receives the billing amount and utility rates from PG&E, SDG&E, and PacifiCorp for pre-installation. While Liberty and SCE only provide the aggregated consumption data. The PA will work with Liberty and SCE to obtain the billing amount and utility rates.</p> <p>Stakeholders: IOUs and Property Owners Timeline: TBD</p>

IOU Recommendations and Responses on Next Page

IOU Recommendations Table

Item #	Page #	Findings	Best Practice / Recommendations	PG&E (if applicable)		SCE (if applicable)		SDG&E (if applicable)		Liberty Utilities (if applicable)		PacifiCorp (if applicable)	
				Disposition	Disposition Notes	Disposition	Disposition Notes	Disposition	Disposition Notes	Disposition	Disposition Notes	Disposition	Disposition Notes
				Choose: Accepted, Rejected, or Other	Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Describe specific program change, give reason for rejection, or indicate that it's under further review.
8	64	See #8 Above	8E. Increase co-marketing with IOUs. Some property owners reported their limited knowledge or awareness of SOMAH has come from a contractor. The SOMAH PA reported their organization has had past success by co-marketing new lesser-known programs with IOUs as they lend credibility to the program so they are taken more seriously. The SOMAH PA has discussed this with some of the IOUs but have received resistance as the IOUs do not have a SOMAH program marketing budget.	Other	PG&E has introduced the SOMAH PA to PG&E's Single Point of Contact (SPOC) team and is currently working with CSE in sending emails to EV Charge Network (EVCN) lists. Other co-marketing ventures are under further review. To address the lack of SOMAH program marketing budget for the IOUs, the IOUs could potentially report marketing spend and forecasted marketing spend (a new line item under IOU administrative costs) in the SOMAH Utility Semi-Annual Administrative Expense Report.	Accepted	SCE has been collaborating with SOMAH PA to market program on SCE.com website & CBO Newsletters. More recently have been partnering with ESA/IQP and Transportation Electrification program managers to co-brand brochures and presentations This effort will cross-promote programs and allow easier transition and communications for customers.	Other	SDG&E increased its marketing of SOMAH with its ESA CAM implementor providing additional collateral during audits/enrollments.	Accept		Accepted	PacifiCorp is working with the Center for Sustainable Energy to develop a co-marketing and outreach plan. However, as noted, the availability of funds to market this program are limited by the 10% administrative cost caps and the portion of the administrative budget that already go to the PA team.
18	135	See #18 Above	IOUs should reassess their VNEM tariff language to clarify requirements for solar and storage pairing.	Other	The current version of the NEM2VSOM tariff allows for storage only behind the generating meter. Additional conversations with SGIP PAs, other IOUs, and Energy Division are in progress to see if tariffs need to be updated.	Accepted	SCE's SGIP team is leading efforts to clarify or modify as need VNEM tariff language.	Other	SDG&E is currently reviewing its tariffs to see if applicable.	Accept	Liberty accepts the need to reassess the VNEM tariff language and requires further review.	Other	PacifiCorp does not participate in SGIP, and SOMAH projects receive credits based on full retail compensation under the NEMVS-139 SOMAH tariff. So there is no financial benefit in pairing a SOMAH project with an storage facility. With regards to a resiliency-based storage facility, a project would need to be individually designed to provide the resiliency benefit and thus does not lend itself to standardized language in a tariff.
20	137	As part of SOMAH's application process the IOUs provide the SOMAH PA with historical consumption data for the tenant and common area meters associated with a SOMAH project (IOU data request). The account or meter numbers for this request are not uniformly being retained by IOUs.	Retaining the account numbers or meter numbers used to complete the IOU data request queries would ease the burden of pulling the interval data needed for future impact evaluations.	Accepted	PG&E has since been retaining this data.	Accepted	SCE's SOMAH team has created and been utilizing a secure file transfer location for all customer usage data requests. Data requests are labeled in sequential order and easily searchable.	Agree	SDG&E retains the historical data provided to the SOMAH PA	Accept		Accepted	When requested, PacifiCorp will provide account and meter data. We will retain the information in the IOUS files to streamline all processes affiliated with a specific project moving forward.