

**SOUTHERN CALIFORNIA TRIBAL CHAIRMEN'S ASSOCIATION
(SCTCA) COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING
ON CLOSE-OUT OF THE SELF-GENERATION INCENTIVE PROGRAM
REQUIREMENTS**



FILED
05/12/25
04:59 PM
R2005012

**APPENDIX A
LETTERS OF SUPPORT**

Table of Contents:

Ampla Health: p.1
City of Arcata: p.2
City of Irvine: p.3
City of Santa Monica: p.4
Community Mutual Water Company: p.5
Fallbrook Food Pantry: p.6
Free Clinic Simi Valley: p.7
La Jolla Band of Luiseno Indians: p.8
Laguna Food Pantry: p.10
Lake Casitas Park Store: p.11
Lundy Mutual Water Company: p.12
Mammoth Lakes Fire Department: p.13
Manzanita Band of the Kumeyaay Nation: p.14
Mountain Vista Ojai: p.16
Open Door Community Health Centers: p.17
Pala Band of Mission Indians: p.18
Planned Parenthood Central Coast: p.19
Republic Services of Sonoma County: p.20
Rincon Band of Luiseno Indians: p.21
San Pasqual Band of Mission Indians: p.25
Sanel Valley Market: p.27
Sisar Mutual Water Company: p.28
St. Mary's Gas And Mini Mart: p.29



March 25, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Ampla Health supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Ampla Health's highly trained and professional medical personnel offer a wide range of medical services to our patients, including pediatrics, internal medicine, women's health, and dental care.

Our agency has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 52.8 kilowatt-hours of energy storage capacity for \$51,797.00. This system will provide much-needed resiliency and other benefits to Ampla Health Los Molinos Medical Center's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Ampla Health urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Tehama County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact John Fleming at jfleming@amplahealth.org / (530) 751-3740.

Sincerely,

A handwritten signature in blue ink that reads "John Fleming".

John Fleming
Director of Planning & Development



736 F Street
Arcata CA 95521

City Manager
707-822-5953

Environmental Services
707-822-8184

Police
707-822-2428

Recreation
707-822-7091

Community Development
707-822-5955

Finance
707-822-5951

Engineering
707-825-2128

Transportation
707-822-3775

March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

The City of Arcata supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. The City of Arcata has provided critical services to our Humboldt County community since its founding in 1850.

Our city has two (2) active SGIP Equity SGIP rebate reservation for systems totaling 312.94 kilowatt-hours of energy storage capacity for \$298,820.00. These systems will provide much-needed resiliency and other benefits to Arcata's City Hall and Community Center, critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of these projects has been delayed.

If the Commission does not authorize additional extensions, these essential projects will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

The City of Arcata urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Humboldt County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Emily Sinkhorn at esinkhorn@cityofarcata.org or (707) 825-2163.

Sincerely,

Emily Sinkhorn
Environmental Services Director



March 20, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

The City of Irvine, California supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing.

Our City has one active SGIP Equity rebate application/reservation for a battery energy system totaling 3916.8 kilowatt-hours of energy storage capacity for \$2,495,086.80. This microgrid system will provide much-needed greenhouse gas reduction, utility bill savings and resiliency to the Irvine Civic Center and Public Safety headquarters, both critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control including, but not limited to, Southern California Edison delays during the interconnection application process, significant supply-chain delays in the post Covid-19 environment and recent tariffs causing pricing uncertainty in the market, completion of this project by the SGIP timeframe has been delayed. In fact, the City had to withdraw its original Equity SGIP application and reapply, subjecting the project to Net Billing Tarriff and costing the project over 2 million dollars (60% reduction) in net savings loss.

If the Commission does not authorize additional extensions, essential projects will be at-risk of cancelation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermining the community and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

The City of Irvine urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our City and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact me at lestevez@cityofirvine.org.

Sincerely,

Luis Estevez
Acting Director, Public Works & Sustainability
City of Irvine, California



Public Works Department

March 17, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

City of Santa Monica supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing.

Santa Monica has one (1) active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 1606 kilowatt-hour of energy storage capacity for \$1,365,100.00. This system will provide much-needed resiliency and other benefits to Santa Monica's City Yards, a critical facility serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain delays for the requisite system components, completion of this project has been delayed.

If the Commission does not authorize additional extensions, essential projects will be at risk of cancelation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

City of Santa Monica urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Elias Platte-Bermeo at elias.platte-bermeo@santamonica.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Dishlip", is written over a light blue horizontal line.

Chris Dishlip

Assistant Director of Public Works
City of Santa Monica

COMMUNITY MUTUAL WATER COMPANY

March 24th, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Community Mutual Water Company supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Community Mutual Water Company is a Ventura County mutual water utility which has proudly served our community since founded in 1920 (nonprofit since 1934).

Our mutual water company has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 764.27 kilowatt-hours of energy storage capacity for \$683,500.00. This system will provide much-needed resiliency and other benefits to Community Mutual Water Company's critical operations for our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the devastating Palisades and Altadena fires, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Community Mutual Water Company urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Robert Eranio at reranio@hotmail.com / (805) 732-0495.

Sincerely,



Robert Eranio
General Manager



March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Fallbrook Food Pantry supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Fallbrook Food Pantry has been meeting the needs of this community since 1991 and over the years we have increased food holding capacities and delivery capabilities in pursuit of the most efficient and effective ways to provide nutritious and sustainable food to the San Diego County community.

Our Food Pantry has two (2) active SGIP Equity or Equity Resiliency SGIP rebate reservations for systems totaling 104.63 kilowatt-hours of energy storage capacity for \$101,105.00. These systems will provide much-needed resiliency and other benefits to Fallbrook Food Pantry's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of these projects has been delayed.

If the Commission does not authorize additional extensions, these essential projects will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Fallbrook Food Pantry urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our San Diego County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Shae Gawlak at director@fallbrookfoodpantry.org / (760) 728-7608.

In good health,

Shae T. Gawlak
Chief Executive Officer

"...because when you are hungry, nothing else matters."

140 N. Brandon Road | Fallbrook CA 92028 | (760) 728-7608 www.fallbrookfoodpantry.org

Fallbrook Food Pantry is a 501(c)3 organization. Our tax ID number is 33-0491216.


FREE CLINIC OF SIMI VALLEY
MEDICAL • COUNSELING • LEGAL • DENTAL

March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

The Free Clinic of Simi Valley supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. The Free Clinic of Simi Valley has been providing high quality medical services to our Ventura County community since our founding in 1971. FCSV's Free Clinic Multi Services Center houses a variety of services, including a nurses station, pharmacy, phlebotomist lab, exam rooms, dental stations, tattoo removal room, family counseling rooms, and legal offices.

Our clinic has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 254.26 kilowatt-hours of energy storage capacity for \$244,515.71. This system will provide much-needed resiliency and other benefits to the FCSV Free Clinic Multi Services Center's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Free Clinic of Simi Valley urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Fred Bauermeister at fred@freeclinicsv.com / (805) 522-3733.

Sincerely,


Fred Bauermeister
Executive Director

2003 Royal Avenue, Simi Valley, California 93065 / 805.522.3733 / Fax 805.522.9576
www.freeclinicsv.com

Wesley Ruise, Jr
Chairman

Jack Musick Sr.
Vice-Chairman

Angela Miner
Secretary



LA JOLLA BAND OF LUISEÑO INDIANS

22000 Hwy 76 Pauma Valley, CA 92061

P: (760)742-3771 | F: (760)742-1704

www.Lajollaindians.org

Joseph J. Amago
Treasurer

John Paipa
Council Member

March 13, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for Modification of Decision 15-06-002 Concerning Self-Generation Incentive Program Requirements

Honorable CPUC Commissioners,

The La Jolla Band of Luiseño Indians supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing. The La Jolla Band of Luiseño Indians is a federally recognized Native American Tribe located in San Diego County.

Our Tribe has four (4) active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 36,965 kilowatt-hours of energy storage capacity for \$298,581. These systems will provide much-needed resiliency and other benefits to critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain issues and a contractor bankruptcy, completion of these projects has been delayed.

2020-6674 - Eastern Water System - Final Extension expires 8/28/2025; 9,510 kWh, \$90,307.00

2020-6676 - Gymnasium - Final Extension expires 7/7/2025; 4,118 kWh, \$38,887.00

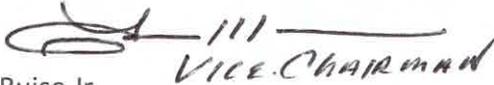
2020-6678 - Tribal Trading Post - Final Extension expires 7/30/2025; 13,728 kWh, \$130,500.00

2020-6679 - Administration Building - Final Extension expires 12/24/2025; 4,118 kWh, \$38,887.00

If the Commission does not authorize additional extensions, essential projects will be at risk of cancelation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

The La Jolla Band of Luiseño Indians urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Tribe and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Mark Webb at mark.webb@lajolla-nsn.gov, or Rob Roy at rob.roy@lajolla-nsn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Wesley Ruise Jr.", followed by a horizontal line and the words "VICE-CHAIRMAN" written in all caps.

Wesley Ruise Jr.
Chairman



SERVING THE COMMUNITY SINCE 1993

March 25, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Laguna Food Pantry supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing. Laguna Food Pantry is a 501(c) 3 nonprofit providing free, fresh, nutritious groceries to families and individuals in need. Our organization on Laguna Canyon Road serves about 250 families per day.

Our food pantry has one (1) active SGIP Equity or Equity Resilience SGIP rebate reservation for systems totaling 184.4 kilowatt-hours of energy storage capacity for \$184,800. This system will provide much-needed resiliency and other benefits to Laguna Food Pantry's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID-19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Laguna Food Pantry urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact me at director@lagunafoodpantry.org.

Sincerely,

Anne Broussard Belyea
Executive Director

March 21, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

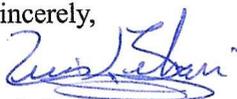
Lake Casitas Park Store supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Lake Casitas Park Store is a locally-owned general store that offers grocery staples, camping equipment, and retail hardware to the community surrounding the Lake Casitas Recreation Area in Ventura County.

Our store has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 66 kilowatt-hours of energy storage capacity for \$66,000.00. This system will provide much-needed resiliency and other benefits to Lake Casitas Park Store's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

Due to the SGIP Program's current extension structure, we were forced to reapply for SGIP incentives after our original application (SCE-SGIP-2021-12606) was cancelled for failure to meet SGIP deadlines following the supply chain disruptions related to COVID-19, the sudden unexpected insolvency of Swell Energy, and protracted interconnection review by SCE (including inconsistent feedback on the same submission item) before our appeal for an additional 90-day extension under the Developer bankruptcy exception outlined in §2.1.2 of the 2025 SGIP Handbook was rejected by the SCE SGIP Program Administrators on 3/5/25. This has incurred further administrative burden on this project and has subjected the previously paid 5% SGIP Application Fee to risk of forfeiture, pending the outcome of our appeal to have the processed 5% Fee transferred to our newly submitted SGIP application. Further uncertainty surrounding the SGIP incentive award for this project could impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create amplified financial challenges at a particularly inopportune time.

Lake Casitas Park Store urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Luis Berbari at casitasparkstore@gmail.com / 714-369-3777.

Sincerely,



Luis Berbari
Owner

March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Lundy Mutual Water Company supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Lundy Mutual Water Company is a nonprofit mutual water utility which has proudly served our Mono County community since founded in 1962.

Our mutual water company has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 127.13 kilowatt-hours of energy storage capacity for \$124,017.07. This system will provide much-needed resiliency and other benefits to Lundy Mutual Water Company's critical operations for our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Lundy Mutual Water Company urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Mono County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Karl Seiberling, karlseiberling@gmail.com, 760 914-3611

Sincerely,



Karl Seiberling

Mono City Facilities Manager

March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

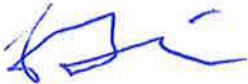
Mammoth Lakes Fire Department supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Mammoth Lakes Fire Protection District (MLFPD) has been serving the residents and visitors of Mammoth Lakes since 1948, proudly providing services in prevention, planning, and response to all types of emergencies. We have served as a leader and partner to our surrounding agencies as we serve the wider region together.

Our department has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 127.13 kilowatt-hours of energy storage capacity for \$124,017.07. This system will provide much-needed resiliency and other benefits to Mammoth Lakes Fire Department's critical operations for our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Mammoth Lakes Fire Department urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Mono County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Ales Tomaier at ales@mlfd.ca.gov / (760) 924-9004.

Sincerely,



Ales Tomaier
Fire Chief



Manzanita Band of the Kumeyaay Nation

March 27, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Manzanita Band of Kumeyaay Nation supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for SGIP Equity and Equity Resilience projects that are in good standing. Manzanita is a federally recognized Native American Tribe located in San Diego County.

Manzanita has 2 active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 52.8 kilowatt-hours of energy storage capacity for \$52,378. These systems will provide much-needed resiliency and other benefits to the Manzanita Activity Center and another community building, critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, particularly the dissolution of Swell Energy, completion of these projects has been delayed. The SGIP rebate specified battery energy storage systems have been installed at these facilities but permission to operate (PTO) has not yet been obtained due to interconnection application nonpayment and cancellation under Swell's management, which the new developer is in the process of correcting.

If the Commission does not authorize additional extensions, these essential projects will be at risk of cancellation for failure to meet SGIP deadlines, with current rebate reservations set to expire on July 12, 2025 and August 28, 2025. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Manzanita urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our community and other communities across the State that are experiencing

similar challenges. If you have any questions regarding this letter, please contact Paola Martinez Montes, Tribal Administrator, at paolamartinezmontes@manzanita-nsn.gov.

Sincerely,



Angela Elliott Santos
Tribal Chairwoman
Manzanita Band of the Kumeyaay Nation

March 25, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

California Retirement Homes, Inc. (Mountain Vista of Ojai) supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Mountain Vista of Ojai is a family-owned and operated RCFE that takes pride in providing exceptional care for all our residents; our expert caregivers have been serving our Ventura County community since 1988.

Our assisted living facility has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 66.0 kilowatt-hours of energy storage capacity for \$66,000.00. This system will provide much-needed resiliency and other benefits to Mountain Vista of Ojai's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Mountain Vista of Ojai urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Sabino Perez at s72perez@msn.com / (805) 646-6850.

Sincerely,



Sabino Perez
Co-Owner

March 26, 2025

- ☐ **Administration, Finance, and Human Resources**
1275 Eighth Street
Arcata, CA 95521
(707) 826-8633
- ☐ **Billing**
1385 Eighth Street
Arcata, CA 95521
(707) 826-8642
- **Burre Dental Center
Mobile Dental Services**
959 Myrtle Avenue
Eureka, CA 95501
- **Del Norte Community
Health Center**
550 East Washington Boulevard
Crescent City, CA 95531
- **Eureka Community
Health & Wellness Center**
2200 Tydd Street
Eureka, CA 95501
- **Ferndale Community
Health Center**
638 Main Street (PO Box 1157)
Ferndale, CA 95536
- **Fortuna Community
Health Center**
3750 Rohnerville Road
Fortuna, CA 95540
- **Humboldt Open Door Clinic**
770 Tenth Street
Arcata, CA 95521
- **McKinleyville Community
Health Center**
1644 Central Avenue
McKinleyville, CA 95519
- **Mobile Health Services /
Telehealth & Visiting
Specialists Center**
2426 Buhne Street
Eureka, CA 95501
- **NorthCountry Clinic**
785 18th Street
Arcata, CA 95521
- **NorthCountry Prenatal Services**
3800 Janes Road, Suite 101
Arcata, CA 95521
- **Open Door Downtown**
622 H Street,
Eureka, CA 95501
- **Open Door Gynecology Services**
3770 Janes Road,
Arcata, CA 95521
- **Redwood Community
Health Center**
2350 Buhne Street, Suites A & C
Eureka, CA 95501
- **Willow Creek Community
Health Center**
38883 Highway 299
Willow Creek, CA 95573
- **Member Services**
550 E Washington Blvd, Suite 100
Crescent City, CA 95531
963 Myrtle Avenue
Eureka, CA 95501

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Open Door Community Health Centers supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Since founded in 1971, Open Door Community Health Centers has proudly provided primary and dental care, counselling, pharmacy services, and community support offices, serving about 65,000 patients a year and employing almost 800 members across our communities. The Fortuna Community Health Center, opened in 2018, provides outpatient medical and dental services to the Humboldt County community and is designed to accommodate over 200 patients per day.

Our clinic has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 696.0 kilowatt-hours of energy storage capacity for \$628,000.48. This system will provide much-needed resiliency and other benefits to the ODCH Fortuna Community Health Center's critical operations for our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Open Door Community Health Centers urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Humboldt County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Dwayne Lemos at dlemos@opendoorhealth.com / (707) 498-6621.

Sincerely,



Dwayne Lemos
Director – Corporate Services



**PALA BAND OF
MISSION INDIANS**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
Phone 760-891-3500 | Fax 760-742-1411

March 13, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

The Pala Band of Mission Indians supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing. The Pala Band is a federally recognized Native American Tribe located in San Diego County.

Our Tribe has seven active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 2,069 kilowatt-hours of energy storage capacity for \$2,011,083. These systems will provide much-needed resiliency and other benefits to Pala's Administration Building, wastewater treatment facility, radio station, Tribal law enforcement, fire station, and public shelters, all of which are critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including the covid pandemic, supply chain disruptions, project engineering complexities, and the bankruptcy of developer Swell Services Inc., completion of these projects has been delayed.

If the Commission does not authorize additional extensions, essential projects will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

The Pala Band urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Tribe and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Shasta Gaughen, Environmental Director, at sgaughen@palatribe.com.

Sincerely,

Robert Smith, Chairman
Pala Band of Mission Indians



Planned Parenthood California Central Coast

March 25, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Planned Parenthood California Central Coast supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Planned Parenthood California Central Coast is a nonprofit that has been providing high-quality healthcare for communities across California's Central Coast since 1964 and serves nearly 30,000 patients annually across our six health centers.

Our organization has seven (7) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 509.0 kilowatt-hours of energy storage capacity for \$466,392.00. These systems will provide much-needed resiliency and other benefits to Planned Parenthood's Thousand Oaks and San Luis Obispo Health Centers, critical facilities serving these communities. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of these projects has been delayed.

If the Commission does not authorize additional extensions, these essential projects will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Planned Parenthood California Central Coast urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Central California communities and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Yolanda Robles at yolanda.robles@ppcentralcoast.org / (805) 722-1512.

Sincerely,

Yolanda Robles
Chief Operating Officer

March 25, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Republic Services of Sonoma County, Inc. supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Republic Services of Sonoma County provides critical waste and recycling services to all communities North of Petaluma in Sonoma County, with the Sonoma Central Disposal Site generating and processing over one million gallons of wastewater per month in addition to the facility's collection, processing, transfer, and disposal of broader waste streams for our service territory.

Our facility has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 508.52 kilowatt-hours of energy storage capacity for \$464,000.00. This system will provide much-needed resiliency and other benefits to Republic Services' wastewater processing infrastructure, critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Republic Services of Sonoma County urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Sonoma County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Derek Cheney at dcheney@republicservices.com / (510) 301-9387.

Sincerely,



Derek Cheney
Environmental Manager

DECLARATION

Under California Public Utilities Commission Rule 47 governing Petitions for Modification, the Rincon Band of Luiseno Indians, a federally recognized Indian tribe, supports the following affidavit:

Multiple challenges have emerged or intensified over the past three years that have slowed or stalled completion of numerous battery energy storage projects with *Self-Generation Incentive Program* (SGIP) rebate reservations. Such challenges include:

- Microgrids are more difficult to deploy than anticipated. Microgrid development requires sophisticated orchestration of many distinct elements, including securing accurate data from the utility in which the project is being sited, and ultimately interconnecting with the grid. As now acknowledged by Pacific Gas and Electric Company (PG&E), a microgrid “...involves deep technical and contractual collaboration with the utility and can take 3-5 years or more to develop.”
- Supply chains remain difficult to navigate, with unanticipated extended lead times and chronic price inflation. In the electrical equipment space, supply chain disruptions are not just an inconvenience. They can bring entire projects to a standstill. After pandemic-related supply chain disruptions starting in 2020, global instability in 2024 caused further uncertainty within the supply chain, and that uncertainty continues in 2025 (see also below).¹ Switchgear equipment in particular is commonly taking a year or more to manufacture and deliver after final purchase orders.
- Although the Commission and State Legislature have taken action to resolve delays in utility energization, interconnection applications, studies, and approvals often take more time than expected.
- Native American Tribes have limited capacity to engage in protracted contract negotiations with developers on complex and new types of projects. Engaging in SGIP tends to be a learning process for both Tribes and local governments – entities specifically expected to undertake equity-related projects by the Commission. The extent of these complexities was not anticipated and they are not reflected in present program timelines.
- As sovereign governments, Tribes apply unique building and permitting requirements. Many California Tribes adopt California Title 24 Building Standards Code, but few Tribes have in-house building departments or inspection staff. This can lead to lengthy and complex processes to establish third party code compliance, inspection, and other due diligence processes that contractors must fulfill for project authorization.

¹ [Supply chain predictions for 2025](#)

- For some projects, Tribes must negotiate approvals for new utility right-of-way easements with the U.S. Bureau of Indian Affairs (BIA). Many Tribes experience protracted delays caused by BIA and utilities in processing easement requests. Further, in some cases existing utility infrastructure is trespassing on Tribal lands due to utilities' earlier failure to secure easements. These issues can severely delay project interconnection and energization required to claim SGIP incentives.
- The recently inaugurated federal administration has created uncertainty, delays, and cost increases, related to grant funding disruptions and staff changes as well as threatened or actual implementation of tariffs that impact important SGIP project equipment and materials. Electronics and machinery comprise more than half of Chinese exports to the United States; tariffs are causing equipment and component makers to reexamine and potentially renegotiate their supply sources.² And growing volatility in minerals markets are prompting suppliers to cancel quotes and raise prices.
- The bankruptcies of developers (*e.g.*, Swell Services, Sunpower) have created delays lasting longer than the 6 months (two 90-day extensions) provided by the SGIP Handbook. The process of terminating agreements with bankrupt developers, assuming control of purchase orders, and procuring new developers and subcontractors has imposed substantial unexpected costs, complexities, and delays on numerous SGIP equity resiliency projects.

The signatory below represents the Rincon Band of Luiseño Indians, a federally recognized Tribe with five (5) SGIP incentive reservations. All of the Rincon Band's SGIP projects have been substantially delayed as a result of the factors above, such that they all are at risk of exhausting all of the extensions provided in the current SGIP Handbook before they achieve permission to operate and are energized by San Diego Gas & Electric. The Rincon Band has already invested millions of dollars in these projects, including purchasing major equipment and commencing construction. The Rincon Band joins numerous other California Tribes and other communities in petitioning the Commission for modification of SGIP terms to allow sufficient time to complete delayed battery energy storage projects and satisfy requirements for claiming SGIP incentives.

Signed,



Date: March 13, 2025

Denise Turner Walsh
Attorney General
Rincon Band of Luiseño Indians

² [How Trump's Tariffs Are Impacting the Global Supply Chain](#)

Rincon Band of Luiseño Indians

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



March 13, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: PETITION FOR MODIFICATION OF DECISION 15-06-002 CONCERNING SELF-GENERATION INCENTIVE PROGRAM REQUIREMENTS

Honorable CPUC Commissioners:

The Rincon Band of Luiseño Indians (Rincon Band) supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing. The Rincon Band is a federally recognized Indian tribe, with Tribal lands located in San Diego County.

The Rincon Band has five active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 5,744.8 kilowatt-hours of energy storage capacity for \$3,607,151.48. These systems will provide much-needed resiliency and other benefits to the Rincon Government Center, Fire Station, a freshwater pumping station, and a public cooling center, critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including, the covid pandemic, supply chain disruptions, project engineering complexities, the bankruptcy of developer Swell Services Inc., and delays in utility right-of-way easement processes, completion of these projects has been delayed.

If the Commission does not authorize additional extensions, essential projects will be at risk of cancelation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Bo Mazzetti
Chairman

Joseph Linton
Vice Chairman

Laurie Gonzalez
Council Member

John Constantino
Council Member

Alfonso Kolb, Sr.
Council Member

California Public Utilities Commission
March 13, 2025
Page 2

The Rincon Band urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Tribe and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact me by telephone at (760) 689-5727 or by email at dwalsh@rincon-nsn.gov.

Sincerely yours,

RINCON BAND OF LUISEÑO INDIANS

A handwritten signature in blue ink, appearing to read 'D. Walsh', with a long horizontal stroke extending to the right.

Denise Turner Walsh
Attorney General



SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

March 27, 2025

TRIBAL COUNCIL

Stephen W. Cope
Tribal Chairman

Victoria Diaz
Vice Chair

Lydia Escalante
Secretary-Treasurer

Roberta Cameron
Councilmember

Joyce L. Stein
Councilmember

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

The San Pasqual Band of Mission Indians supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resilience projects that are in good standing. The San Pasqual Band is a federally recognized Native American Tribe located in San Diego County.

Our Tribe has two active SGIP Equity or Equity Resilience SGIP rebate reservations for systems totaling 79 kilowatt-hours of energy storage capacity for \$78,197. These systems will provide much-needed resiliency and other benefits to critical facilities serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including the covid pandemic, supply chain disruptions, the bankruptcy of developer Swell Services Inc., and delays in utility interconnection processes, completion of these projects has been delayed.

If the Commission does not authorize additional extensions, essential projects will be at risk of cancelation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

The San Pasqual Band urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Tribe and other communities across the State that are experiencing similar challenges. If you have

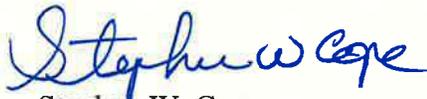
California Public Utilities Commission

March 27, 2025

Page 2 of 2

any questions regarding this letter, please contact Stephen W. Cope at 760-749-3200.

Sincerely,



Stephen W. Cope

Tribal Chairman

San Pasqual Band of Mission Indians

March 21, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Sanel Valley Market supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Sanel Valley Market is a locally-owned general store that offers grocery staples, camping equipment, and retail hardware to the Mendocino County community.

Our store has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 66 kilowatt-hours of energy storage capacity for \$66,000.00. This system will provide much-needed resiliency and other benefits to Sanel Valley Market's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Sanel Valley Market urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Mendocino County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Rakesh Mittal at mymr123@yahoo.com / (707) 744-8474.

Sincerely,



Rakesh Mittal
Owner

SISAR MUTUAL WATER COMPANY

1195 Cliff Dr
Fillmore, CA 93015

March 26, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Petition for modification of decision 15-06-002 concerning self-generation incentive program requirements

Honorable CPUC Commissioners,

Sisar Mutual Water Company supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. Sisar Mutual Water Company is a Ventura County mutual water utility which has proudly served our community since founded in 1949.

Our mutual water company has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 215.14 kilowatt-hours of energy storage capacity for \$215,140.00. This system will provide much-needed resiliency and other benefits to SMWC's critical operations for our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

Sisar Mutual Water Company urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Ventura County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Rod Thompson at rodthompson1@verizon.net / (805) 660-2453.

Sincerely,



Rod Thompson
President Emeritus

March 21, 2025

California Public Utilities Commission
300 Capitol Mall, Suite 500
Sacramento, CA 95814

**RE: Petition for modification of decision 15-06-002
concerning self-generation incentive program requirements**

Honorable CPUC Commissioners,

St. Mary's Gas & Mini Mart supports the joint Petition for Modification of Decision 15-06-002 to increase the time allowed to fully implement Self-Generation Incentive Program-funded projects, filed by the Southern California Tribal Chairmen's Association (SCTCA) and Local Government Sustainable Energy Coalition (LGSEC). In recognition of a cascading series of challenges acting to delay successful project completion, the Petition requests that the Commission authorize four additional six-month project extensions for Equity and Equity Resiliency projects that are in good standing. St. Mary's Gas & Mini Mart is a locally-owned general store that offers grocery staples and retail hardware to the Kern County community

Our store has one (1) active SGIP Equity or Equity Resiliency SGIP rebate reservation for systems totaling 79.2 kilowatt-hours of energy storage capacity for \$79,200.00. This system will provide much-needed resiliency and other benefits to St. Mary's Gas & Mini Mart's critical operations serving our community. Due to a host of circumstances that could not have been anticipated and are beyond our control, including supply chain disruptions related to COVID -19 and the sudden unexpected insolvency of Swell Energy, completion of this project has been delayed.

If the Commission does not authorize additional extensions, this essential project will be at-risk of cancellation for failure to meet SGIP deadlines. Such an outcome would impose significant

losses of resilience capacity, undermine the community's and CPUC's ability to achieve environmental and equity goals, and create financial challenges at a particularly inopportune time.

St. Mary's Gas & Mini Mart urges the Commission to expeditiously approve SCTCA and LGSEC's joint Petition for Modification on behalf of our Kern County community and other communities across the State that are experiencing similar challenges. If you have any questions regarding this letter, please contact Feby Gergas at febyfakhry@hotmail.com / (661) 822-3638.

Sincerely,

Feby Gergas
Owner

Feby

3/25/25

A handwritten signature consisting of a horizontal line with a stylized, downward-pointing flourish underneath it.