

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



Order Instituting Rulemaking on Customer-  
Generated Renewables for Priority  
Communities.

Rulemaking 25-01-005  
(Filed January 16, 2025)

**FILED**

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**NOTICE OF EX PARTE COMMUNICATIONS OF SUNRUN, INC.**

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Date: December 05, 2025

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Pursuant to Rule 8.4(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Sunrun provides this notice of two ex parte meetings.

The first ex parte meeting was with Adam Buchholz, Advisor to Commissioner John Reynolds. The meeting was held Tuesday, December 2, 2025 from 11:00 am – 11:30 am via WebEx. The non-Commission persons in attendance were Andy Blauvelt, Sunrun; Andrew Dawson, California Housing Partnership; Bryan Dove, Eden Housing; Katherine Fleming, EAH Housing; and Grace Pratt, Caliber Strategies.

The second ex parte meeting was with Justin Ong, Chief of Staff to Commissioner Matthew Baker. The meeting was held Wednesday, December 3, 2025 from 3:30 pm – 4:00 pm via WebEx. The non-Commission persons in attendance were Andy Blauvelt, Sunrun; Lauren Nevitt, Sunrun; Andrew Dawson, California Housing Partnership; Anna Gwyn Simpson, EAH Housing; and Tom White, Sustainable Energy Solutions.

During both meetings, the participants discussed the pending changes to the Solar On Multifamily Affordable Housing (SOMAH) program to implement Senate Bill 355 (Stats. 2024, Ch. 393), which expands SOMAH eligibility to include otherwise-eligible newly constructed affordable housing as well as properties that do not have individual tenant household accounts. The SOMAH Participants outlined the importance of these SOMAH expansions:

- **New Construction.** The SOMAH Participants spoke of the inherent difficulty in funding new construction of affordable housing. The SOMAH Participants explained that offering the SOMAH incentives to allow new construction projects to go beyond the minimum solar requirements in the California Energy Code would be welcome not only for the financial assistance, but also because it would allow them to construct the best properties feasible at the outset.
- **Owner-Provided Utilities.** It is common for permanent supportive housing for extremely-low income individuals and households experiencing recent homelessness, mental health issues and other significant life challenges to have properties with owner-provided utilities. These not only include master-metered properties but also individually metered properties where the tenants are not responsible for their own utility accounts. It is important that all of these low-income housing properties be eligible for SOMAH.

For the expansion of SOMAH into these eligibility categories, the SOMAH Participants explained that well-established mechanisms exist to ensure compliance with SOMAH rules:

- **New Construction.** New construction is required to have solar as a part of Title 24. All affordable housing projects use energy consultants to evaluate Title 24 energy requirements and can identify the minimum amount of solar and storage needed to achieve compliance. Additional solar and storage above that threshold would qualify for SOMAH incentives. The SOMAH Participants explained that the SOMAH rules requiring free solar for tenants should only apply to the incentivized solar. For the solar that is required under Title 24, some developers will need to adjust the tenant utility allowances, consistent with federal HUD and state rules, by using the California Utility Allowance Calculator (CUAC). The participants then explained that the Commission Multifamily Affordable Solar Housing

(MASH) Program has already previously developed guidelines for accounting for such situations where a portion of the solar must be provided at no cost to the tenants: only the proportion of solar production allocated to tenants' accounts that is not required to directly benefit tenants can be entered into the CUAC or otherwise used to adjust utility allowances.

- **Owner-Provided Utilities.** The SOMAH Participants explained that well-established implementation procedures similarly exist. The federal Low Income Communities (LIC) Bonus Credits program, provided in Internal Revenue Code § 48E(h) already has a method for providing indirect tenant benefits from solar and demonstrating that at least 50% of the overall financial benefits of solar flow to tenants. HUD Notice H 2023-09 provides a list of indirect benefits that can be funded with property solar savings, without interfering with essential low-income housing calculations of tenant income or utility allowance. Additionally, the SOMAH Participants explained, because the LIC program is a tax-credit adder, the IRS regulations already provide a formula to determine the percentage of solar financial benefits being used to fund the indirect benefits. The SOMAH Participants advocated for the Commission to require that SOMAH recipients commit to providing incremental funding for a mix of services and amenities from that list.

All communications were oral; no written materials were shared.

Respectfully submitted,

/s/ Lauren Nevitt

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