

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

**RESOLUTION E-5020
September 12, 2019**

R E S O L U T I O N

Resolution E-5020. Approving GRID Alternatives Advice Letter (AL) 13-E/E-A, Proposed Disadvantaged Communities – Single-family Solar Homes (DAC-SASH) Program Handbook and Program Implementation Plan, Pursuant to Decision (D.)18-06-027.

PROPOSED OUTCOME:

- Approves GRID Alternatives AL 13-E/E-A, Proposed Disadvantaged Communities – Single-family Solar Homes (DAC-SASH) Program Handbook and Program Implementation Plan, filed pursuant to D.18-06-027.

SAFETY CONSIDERATIONS:

- The DAC-SASH program is authorized and operated under Commission policy to ensure the health, safety, and comfort of low-income customers living in Investor Owned Utility service areas. As a result, there are not any expected incremental safety implications associated with approval of this Resolution.

ESTIMATED COST:

- The DAC-SASH program has an authorized budget of \$10 million per year for 2019 through 2030, for a total program budget of \$120 million. The impact on rates is unknown at this time because this program is funded by the Investor Owned Utilities’ greenhouse gas allowance proceeds and only if insufficient revenue is available, then through public purpose program funds.

By GRID Alternatives AL 13-E filed on May 10, 2019 and GRID Alternatives AL-E-A, filed on June 18, 2019.

SUMMARY

This Resolution approves GRID Alternatives Advice Letter (AL) 13-E/E-A, which submitted the original and revised proposed Disadvantaged Communities – Single-family Solar Homes (DAC-SASH) Program Handbook and Program Implementation Plan for Commission review pursuant to Decision D.18-06-027.

BACKGROUND

On June 22, 2018, the California Public Utilities Commission (Commission) issued Decision (D.)18-06-027 *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities* (NEM DAC Decision or Decision), creating three new programs to improve access to renewable generation for residential customers in disadvantaged communities (DACs), pursuant to Assembly Bill (AB) 327 (Perea, 2013).¹ The NEM DAC Decision defined DACs, for the purpose of the programs, as census tracts that are among the top 25 percent most impacted census tracts statewide, using CalEnviroScreen 3.0 scoring.² In addition, the Decision included in the definition of DACs 22 additional census tracts that do not have an overall ranking, but that score among the highest five percent of CalEnviroScreen's Pollution Burden category.³ The programs created in the NEM DAC Decision are the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program, the Disadvantaged Communities Green Tariff (DAC-GT) program, and the Community Solar Green Tariff (CSGT) program.⁴ The Decision ordered that the programs be funded first through Pacific Gas and Electric's (PG&E's), Southern California Edison's (SCE's), and San Diego Gas & Electric's (SDG&E's) (collectively, the Investor Owned Utilities' or IOUs') available greenhouse gas

¹ Pub. Util. Code § 2827.1 (b)(1). AB 327 required the Commission to develop specific alternatives designed to increase adoption of renewable generation by residential customers in DACs.

² D.18-06-027 at Conclusions of Law (COL) 3.

³ *Id.*

⁴ The IOUs' implementation plans for the DAC-GT and CSGT programs were previously addressed in Resolution E-4999 and are not discussed in this Resolution.

(GHG) allowance proceeds and that if those funds are exhausted, then the programs be funded through public purpose program funds.⁵

The NEM DAC Decision described the new DAC-SASH program as follows:

“The DAC-Single-family Solar Homes (DAC-SASH) program, modeled after the Single-family Affordable Solar Homes (SASH) Program, will provide assistance in the form of up-front financial incentives towards the installation of solar generating systems on the homes of low-income homeowners. The DAC-SASH program will be available to low-income customers who are resident-owners of single-family homes in DACs. Unlike traditional SASH, eligibility for DAC-SASH is not limited to designated affordable housing units, and so will be available to a broader group of homeowners than the current SASH program. The incentives provided through DAC-SASH will assist low-income customers in overcoming barriers to the installation of solar energy, such as a lack of up-front capital or credit needed to finance solar installation.”⁶

Appendix A of the NEM DAC Decision laid out rules and requirements for the DAC-SASH program. The Decision also noted, “All SASH program rules not specifically changed in this decision or Appendix A shall apply to the DAC-SASH program.”⁷ Based on the successful operation of the SASH program, the Decision determined that a single, statewide program administrator should similarly be selected through a competitive solicitation to run the DAC-SASH program.⁸ The Commission’s Energy Division was directed to select the DAC-SASH program administrator (PA) through a Request for Proposals (RFP) process managed by SCE on behalf of the Commission. The NEM DAC Decision called for SCE to enter into a contract with the selected PA by October 31, 2018, unless the Energy Division Director modified the date by letter.⁹ On September

⁵ D.18-06-027 at Ordering Paragraph (OP) 8, OP 14.

⁶ Id. at 2-3.

⁷ Id. at 30.

⁸ Id. at 4.

⁹ Id. at OP 2.

6, 2018, SCE submitted a request to extend this deadline to February 28, 2019, which was granted by the Energy Division Director on October 8, 2018.

GRID Alternatives (GRID) was selected as the DAC-SASH PA on January 4, 2019. On February 19, 2019, SCE submitted a second request to extend the contract execution deadline to March 31, 2019, due to ongoing contract negotiations. This request was granted by the Energy Division Director on February 26, 2019. GRID and SCE executed a contract for administration of the DAC-SASH program on April 2, 2019.¹⁰

The NEM DAC Decision directed that, “Once selected, the PA shall hold one or more workshops with interested parties to receive input on appropriate methods for implementing the program, within the policy guidance provided here.”¹¹ GRID held a stakeholder webinar to introduce the DAC-SASH program on April 8, 2019. On that same day, through the service list for the NEM rulemaking (R.)14-07-002, GRID publicized an opportunity to respond to five questions seeking input on implementation of the DAC-SASH program. SDG&E and John McCarthy filed comments by the deadline of April 15, 2019. GRID responded to these comments on May 10, 2019.¹²

The NEM DAC Decision also required the PA to submit the DAC-SASH Program Handbook for Commission consideration as a Tier 3 Advice Letter (AL) after the stakeholder engagement process.¹³ GRID filed AL 13-E on May 10, 2019, with the proposed DAC-SASH Handbook as Attachment A and the proposed Program Implementation Plan (PIP) as Attachment B.

On June 18, 2019, GRID filed supplemental AL 13-E-A with a revised DAC-SASH Handbook and PIP. The new versions of both documents were submitted to address an issue raised by SCE in its response to GRID’s original AL filing.

¹⁰ SCE met the revised March 31, 2019 deadline for contract execution as March 31st was a Sunday and Monday, April 1st was a state holiday. Thus, Tuesday, April 2, 2019 was the first business day after the revised deadline.

¹¹ D.18-06-027 at 36.

¹² “Request for Stakeholder Input” <https://gridalternatives.org/what-we-do/program-administration/dac-sash>

¹³ D.18-06-027 at OP 5.

GRID submitted new versions of the Handbook and PIP as Appendix A to supplemental AL 13-E-A.

GRID's DAC-SASH Program Handbook provides the rules for participating in the DAC-SASH program and outlines program requirements, participant eligibility, and the application and incentive payment processes. The Handbook also includes the program reporting and consumer protections measures required under DAC-SASH.

GRID's DAC-SASH PIP describes how GRID will implement DAC-SASH to achieve the goals that the NEM DAC Decision outlined for the program. The PIP discusses the core components of the DAC-SASH program in greater detail than the Handbook and includes information on GRID's installation model, workforce development initiatives, and energy efficiency education efforts. The PIP also details GRID's procedures for reviewing DAC-SASH applications and verifying the eligibility of participants. Finally, the PIP describes GRID's plans for project financing, marketing, education, and outreach, and reporting, accounting, and evaluation, including a program timeline and budget.

NOTICE

Notice of GRID Alternatives AL 13-E and AL 13-E-A was made by publication in the Commission's Daily Calendar. GRID Alternatives states that a copy of both ALs were mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

On May 30, 2019, SCE submitted a timely response to GRID AL 13-E.

On May 30, 2019, John McCarthy submitted a timely protest of GRID AL 13-E.

On June 6, 2019, GRID replied to SCE's response and to John McCarthy's protest.

The following provides a summary of the major issues raised in the response and the protest, and GRID's reply. For clarity, the issues in the response and the protest are discussed separately, followed directly by GRID's reply.

SCE's Response to GRID's AL 13-E

SCE's response largely focus on suggestions for how the DAC-SASH Program Handbook and PIP could be clarified. SCE asserts that the PIP should be amended to account for the fact that DAC-SASH has an annual budget of \$10 million per year and thus there may be a year in which an IOU may not be able to pay incentives even though the amount is under the IOU's lifetime cap of DAC-SASH incentive funding. SCE also urges that GRID's energy efficiency and Time-of-Use (TOU) education and training for DAC-SASH participants be coordinated between GRID and the IOUs.

SCE's comments also highlight its concern that the IOUs not be responsible for any funding after the program closes. SCE calls for GRID to clarify the post-2030 funding source for the 10-year warranty for no-cost repair on equipment or labor discussed in both the Handbook and PIP. Finally, SCE flags what it views as an inconsistency in the timeframe for GRID to submit the first DAC-SASH marketing, education, and outreach (ME&O) plan. SCE assumes that the 60-day timeline for the ME&O plan's submission discussed in the PIP would equate to the 3rd quarter (Q3) of 2019, but SCE notes that elsewhere in the PIP it states that submission would occur in the 4th quarter (Q4) of 2019. SCE encourages GRID to clarify the intended timeline for ME&O plan submission.

GRID's Reply to SCE's Response

In its reply, GRID agrees with SCE's comment on the annual nature of DAC-SASH funding allocations and the fact that the IOUs should not be liable to pay incentives until funding is available. As a result, GRID submitted a supplemental advice letter (GRID AL 13-E-A) to clarify the IOUs are not obligated to pay amounts greater than their current DAC-SASH budget. GRID also expresses willingness to coordinate energy efficiency and TOU education efforts with the IOUs.

GRID further clarifies that the IOUs will not have any financial obligations for warranties after the DAC-SASH program closes, as GRID will be responsible for upholding warranty obligations and will use its own funding to cover any such costs. Finally, on the ME&O plan submission timeline, GRID explains that because GRID anticipates approval of the Handbook and PIP in August 2019, the

ME&O plan would not be due until at least October, which would be the start of the 4th quarter (Q4) of 2019.

John McCarthy's Protest of GRID's AL 13-E

John McCarthy's protest focuses on concerns about the structure of the DAC-SASH program and the role that GRID Alternatives will play as the program administrator (PA). Many of the themes in Mr. McCarthy's protest are similar to the comments he submitted in response to GRID's request for stakeholder feedback, which GRID responded to on May 10, 2019.¹⁴

Mr. McCarthy asserts that DAC-SASH customers should be allowed to contract with any entity of their choice to install solar on their home and that GRID as the PA should not be involved in installations. Mr. McCarthy states that DAC-SASH systems can be installed for less than \$3.00 per watt, but that GRID has no incentive to reduce the cost of installations. On a related note, Mr. McCarthy argues that Third Party Ownership (TPO) should not be allowed because the \$3.00 per watt incentive should be sufficient, but that if TPO is allowed, the homeowner should be guaranteed to receive at least 90 percent of the benefits of the solar system. In addition, he flags Sunrun as a poor choice for a TPO partner.

On GRID's Subcontracting Partnership Program (SPP), Mr. McCarthy asserts that inspection of 100 percent of installed systems is excessive and that partners should not be required to submit 20 installations for review prior to being admitted to SPP. He also comments that outreach and partnerships should be expanded to any party interested in participating. He additionally asserts that local hiring should be prioritized under workforce development and all systems installed under DAC-SASH should require local hiring of at least two hours per kilowatt. Finally, he states that job training requirements should be the same for all installations – regardless of whether GRID or another entity installs them, and there should be at least one paid trainee on each DAC-SASH project.

¹⁴ "Request for Stakeholder Input" <https://gridalternatives.org/what-we-do/program-administration/dac-sash>

GRID's Reply to John McCarthy's Protest of AL 13-E

GRID's reply asserts that the issues John McCarthy raises are policy issues that have already been considered and addressed in the NEM DAC Decision, and through the competitive selection of GRID as the PA. In addition, GRID notes that stakeholders had opportunity to comment on the DAC-SASH program rules throughout the proceeding leading to the adoption of the NEM DAC Decision. GRID's reply concludes, "The Program Handbook and PIP submission is not the appropriate venue to take these issues up with the Commission."¹⁵

DISCUSSION

The discussion section is arranged into two parts. The first part addresses issues raised in SCE's response to, and Mr. McCarthy's protest of, GRID's AL 13-E. The second part provides the Commission's evaluation of the DAC-SASH Program Handbook and PIP based on what is required in the NEM DAC Decision.

Disposition of SCE's Response and John McCarthy's Protest

The Commission finds that the issues SCE raises in its response have been sufficiently addressed by GRID in its reply, and in its submission of a supplemental AL with a revised DAC-SASH Program Handbook and PIP. GRID's reply clarifies that IOUs will not have financial responsibility for warranties after the close of the program, expresses willingness to collaborate on energy efficiency and TOU, and clarifies the ME&O submission timeline. GRID also revised the DAC-SASH Handbook and PIP to clarify that IOUs are only liable for paying incentives when funding is available.

While the Commission appreciates John McCarthy's interest in, and engagement with, the DAC-SASH program, we concur with GRID that the issues raised in Mr. McCarthy's protest have already been decided in the NEM DAC Decision and in the selection of GRID as the single, statewide program administrator for DAC-SASH, and a protest on an advice letter is not the appropriate venue for raising such concerns.

¹⁵ GRID Alternatives' Reply to Comments of Southern California Edison Company (SCE) and Protest of John McCarthy to its Advice Letter 13. June 6, 2019 at 2.

On Mr. McCarthy's comment that GRID should not be involved in DAC-SASH installations, one of the criteria for selecting the PA described in Appendix A to the NEM DAC Decision is that "the PA is adequately staffed with personnel who have . . . [e]xperience installing and/or designing solar PV systems."¹⁶ Thus, the Decision recognized the opportunity for the PA to take an active role in DAC-SASH installations. GRID's turn-key model was evaluated as part of the competitive solicitation process and found to be in alignment with the requirements of the NEM DAC Decision.

Regarding the incentive level for DAC-SASH installations, the NEM DAC Decision determined that the appropriate funding level is \$3.00 per watt.¹⁷ This issue was determined based on the record in the proceeding, and it is not appropriate to reconsider this determination through the advice letter process.

While Mr. McCarthy argues that third party ownership (TPO) should not be allowed, the NEM DAC Decision explicitly allows for it, stating, "The structure and administration of this program, along with the program incentive levels and authorization for the use of third-party ownership projects when they are determined to be cost effective, will be modeled after the existing SASH program."¹⁸ In the decision reauthorizing the SASH program, D.15-01-027, the Commission adopted minimum consumer protection standards required for TPO of low-income solar installations under the SASH program. The NEM DAC Decision established that these same consumer protection standards, which are restated in Appendix A, are to apply to the DAC-SASH program.¹⁹ Regarding Mr. McCarthy's comment that homeowners should receive at least 90% of the economic benefits of the system under TPO, the first consumer protection standard states that the TPO model must, "[e]nsure program customers receive at least 50% of the savings, as compared to standard utility rates, from the solar generating equipment."²⁰ We concur with GRID's assertion in the DAC-SASH Program Handbook that its TPO model "was fully vetted and approved by the

¹⁶ D.18-06-027 at A-2.

¹⁷ Id. at 22, 29-30, and A-5.

¹⁸ Id. at 29-30.

¹⁹ Id. at A-6, A-7.

²⁰ Id. at A-6.

CPUC” in Resolution E-4719 and that its “TPO model meets the twelve baseline standards established by the Commission and stakeholders to ensure iron-clad consumer protection measures are included and that customers receive meaningful savings.”²¹

Finally, on Mr. McCarthy’s comments on job training requirements, GRID’s proposed workforce training efforts follow the guidance for these activities provided in the NEM DAC Decision.²² In addition, Mr. McCarthy’s assertion that all systems installed under DAC-SASH should require local hiring of at least two hours per kilowatt goes above and beyond the job training and workforce development requirements described in Appendix A to the NEM DAC Decision.²³ A decision regarding minimum hours worked based on some kind of capacity ratio is a decision that is more appropriately considered at the proceeding level. It would be inappropriate to consider this type of recommendation through the advice letter implementation process.

In summary, we find that Mr. McCarthy’s protest raises policy issues that are not appropriate grounds for an advice letter protest and his protest is thus dismissed.

Evaluation of the DAC-SASH Program Handbook and PIP Compliance with CPUC Direction

DAC-SASH Handbook:

The NEM DAC Decision directs the DAC-SASH PA to develop, “A DAC-SASH program Handbook, which we anticipate will contain information comparable to the current SASH Handbook.” Energy Division has reviewed the DAC-SASH Handbook and determined the information in the proposed DAC-SASH Handbook is comparable to the SASH Handbook, with the material adjusted to reflect the program rules that are specific to DAC-SASH. The DAC-SASH Handbook contains all of the same sections and information as the SASH Handbook, with the helpful addition of a section on Warranty Requirements and

²¹ Revised DAC-SASH Handbook at 4. GRID AL 13-E-A at Appendix A.

²² D.18-06-027 at A-9, A-10.

²³ D.18-06-027 at A-9.

a section on Consumer Protections. For example, both Handbooks cover areas such as Generator System Requirements, Energy Efficiency Requirements, Permanency Requirements, and Installation Standards.

There are two notable adjustments made in the DAC-SASH Handbook that we will specifically review. First, GRID asserts that it will not explicitly seek approval to continue working with Sunrun as its TPO partner under DAC-SASH, because GRID's contract with Sunrun to have Sunrun serve as the TPO partner for SASH was previously approved through Resolution E-4719. We find that it is not necessary for GRID to seek re-approval of its TPO partnership with Sunrun given that the Commission has adopted the same set of minimum consumer protection standards for the DAC-SASH program as are required for TPO under the SASH program and the Commission already reviewed GRID's TPO contract with Sunrun under SASH and found it to be in compliance with these standards.²⁴ GRID is authorized to seek approval to work with a new TPO partner under both the SASH and DAC-SASH programs by following the Tier 3 AL process that was established for the SASH program in OP 3 of Resolution E-4719.²⁵

Second, the proposed DAC-SASH Handbook would allow DAC-SASH projects that were approved, but not installed, before the program sunsets at the end of 2030 to receive an incentive payment. Specifically, the Handbook states that all reservation of incentive funds must be made prior to December 31, 2030, and that "[i]ninstallations must be complete by September 30, 2031 to ensure incentive payments are finalized by January 1, 2032."²⁶ The NEM DAC Decision established that the DAC-SASH program shall operate from January 1, 2019 through December 31, 2030.²⁷ The Decision further specifies, however, that, "[m]oney not allocated to specific projects or program expenses by the program end date of December 31, 2030, will be returned to ratepayers at the conclusion of the

²⁴ Resolution E-4719 at OP 1.

²⁵ GRID acknowledged that it intends to follow this process in the Revised DAC-SASH Program Handbook at 4. GRID AL 13-E-A at Appendix A.

²⁶ Revised DAC-SASH Program Handbook at 12. GRID AL 13-E-A at Appendix A.

²⁷ D.18-06-027 at OP 1.

program.”²⁸ Since the DAC-SASH program receives a new allotment of funding annually, in contrast to the SASH program, which received all funding upfront, it is necessary to balance the time required to effectively utilize the final allotment of DAC-SASH incentive funding with the need to ensure unused funding is returned to ratepayers in a timely fashion. We agree with GRID’s proposed approach to allow money allocated to specific projects by the end of 2030 to fund incentive payments for those specified DAC-SASH installations in 2031.

For the reasons discussed above, we find that the DAC-SASH Program Handbook as filed in AL 13-E-A adheres to the guidance in the NEM DAC Decision and should be approved.

DAC-SASH PIP:

The NEM DAC Decision directs that the DAC-SASH “program implementation plan shall include sections on at least the following subjects:

- a. Application procedures;
- b. Requirements for documentation of building and project eligibility;
- c. A program budget that includes line items for incentives and administrative activities, including but not limited to marketing, education, and outreach;
- d. Specific job training requirements consistent with those discussed in Appendix A; and
- e. Data collection and reporting requirements, including report formats.”²⁹

GRID’s proposed DAC-SASH PIP covers each of the subjects listed above. However, GRID notes that because it will use the same format for the semi-annual progress reports that are used for SASH, it did not submit report formats with the PIP.³⁰ We find this approach to be reasonable as the DAC-SASH

²⁸ Id. at OP 8.

²⁹ Id. at OP 5.

³⁰ Revised DAC-SASH Program Implementation Plan at 22.

program is modeled on the SASH program and the Energy Division has deemed the SASH progress report format to be sufficient for summarizing program progress and outcomes. In addition, the DAC-SASH PIP lists all of the reporting requirements specified in the NEM DAC Decision.³¹

We also note that GRID asserts in the PIP that its program administration and ME&O budget comes in at \$1,806,064 below the level authorized for these activities in the NEM DAC Decision.³² GRID states that since it will not need this funding for those tasks, it plans to request transferring this funding to the DAC-SASH incentive budget in a future AL filing.³³ Since that request is not before the Commission at this time, we will not decide the outcome here. If GRID decides to pursue this request, it is already authorized under the NEM DAC Decision to follow the Tier 2 advice letter process for transferring funding between budget categories that was established in the decision reauthorizing the SASH program.³⁴ We do note, however, that the statement on page 31 of the PIP, which indicates that under this approach 87.5% of the DAC-SASH budget would be available for incentives is incorrect. Instead, if GRID's funding reallocation proposal were ultimately adopted, 86.5% of the DAC-SASH budget would be available for incentives, as 1% of the budget will remain available to the Energy Division for program evaluation. If and when GRID submits a funding reallocation proposal, GRID should also submit an updated PIP to fix this error and adjust the program budget accordingly.

For the reasons discussed above, we find that the DAC-SASH Program Implementation Plan adheres to the guidance in the NEM DAC Decision and should be approved.

³¹ D.18-06-027 at A-4.

³² Id. at 29.

³³ Id. at 30.

³⁴ OP 17 of D.15-01-027 provides that, "GRID Alternatives may file a Tier 2 advice letter requesting Commission approval to transfer funding from the Single Family Affordable Solar Homes program's administrative budget to the incentive budget or between non-incentive budgets. Any request to transfer funding shall retain at least 1% of the administrative budget for evaluation."

COMMENTS

Public Utilities Code Section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on August 6, 2019. The Commission did not receive any comments on the draft resolution.

FINDINGS AND CONCLUSIONS

1. Assembly Bill (AB) 327 (Perea, 2013) required the California Public Utilities Commission (Commission) to develop specific alternatives to the net energy metering (NEM) successor tariff designed to increase adoption of renewable generation by residential customers in disadvantaged communities (DACs).
2. On June 22, 2018, pursuant to AB 327, the Commission adopted Decision (D.)18-06-027 (NEM DAC Decision), creating three new programs to provide residential customers in DACs with increased access to renewable generation: the DAC Single-family Solar Homes (DAC-SASH) program, the DAC Green Tariff (DAC-GT) program, and the Community Solar Green Tariff program (CSGT).
3. The NEM DAC Decision established clear rules for the DAC-SASH program that are detailed in Appendix A to that Decision.
4. The NEM DAC Decision required a single, statewide program administrator (PA) to be selected to run the DAC-SASH program.
5. The NEM DAC Decision directed the Energy Division to select the DAC-SASH PA through a Request for Proposals (RFP) process managed by Southern California Edison Company (SCE) on behalf of the Commission.

6. Energy Division selected GRID Alternatives (GRID) to serve as the DAC-SASH PA.
7. The NEM DAC Decision required the selected PA to submit the DAC-SASH Program Handbook for Commission consideration as a Tier 3 Advice Letter (AL), subject to approval in a formal resolution.
8. On May 10, 2019, GRID filed AL 13-E containing the proposed DAC-SASH Handbook and Program Implementation Plan (PIP).
9. On May 30, 2019, SCE submitted a timely response to GRID AL 13-E.
10. On May 30, 2019, John McCarthy submitted a timely protest of GRID AL 13-E.
11. On June 6, 2019, GRID replied to SCE's response to, and John McCarthy's protest of, its AL.
12. GRID filed supplemental AL 13-E-A on June 18, 2019 to address an issue raised in SCE's response.
13. The NEM DAC Decision directed the DAC-SASH Program Handbook to contain comparable information to the approved SASH Program Handbook.
14. GRID's proposed DAC-SASH Program Handbook contains comparable information to the approved SASH Program Handbook.
15. The Commission adopted minimum consumer protection standards for third party ownership of low-income solar installations under the SASH program in Decision 15-01-027. The NEM DAC Decision established that these same consumer protection standards are to apply to the DAC-SASH program.
16. For the DAC-SASH program, it is reasonable to allow GRID to continue its third party ownership partnership with Sunrun that was previously approved by the Commission under the SASH program in Resolution E-4719.

17. The NEM DAC Decision established that the DAC-SASH program shall operate from January 1, 2019 through December 31, 2030.
18. Some DAC-SASH projects may reserve an incentive before December 31, 2030, but not be installed and eligible to receive an incentive payment until 2031.
19. It is reasonable to allow DAC-SASH incentive payments to be finalized by January 1, 2032 for projects that reserved an incentive prior to December 31, 2030 to provide sufficient time to effectively utilize the final allotment of DAC-SASH incentive funding in 2030.
20. The DAC-SASH Program Handbook adheres to the guidance in the NEM DAC Decision therefore it is reasonable to approve the Handbook.
21. The NEM DAC Decision directed the PIP to contain sections on at least the following subjects: application procedures, documentation of building and project eligibility, the program budget, job training requirements, and data collection and reporting requirements.
22. GRID's proposed PIP covers all the subjects specified in the NEM DAC Decision, therefore it is reasonable to approve the PIP.
23. The issues raised by SCE in its response have been sufficiently addressed in GRID's reply and supplemental AL.
24. John McCarthy's protest raises issues that have already been decided in the NEM DAC Decision and is therefore dismissed.

Therefore it is ordered that:

1. GRID Alternatives Advice Letter 13-E/E-A is approved.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on September 12, 2019; the following Commissioners voting favorably thereon:

/s/ALICE STEBBINS

ALICE STEBBINS
Executive Director

MARYBEL BATJER

President

LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA

Commissioners