



February 11, 2020

**Commissioner Martha Guzman Aceves**  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Commissioner Guzman Aceves,

The California Community Choice Association (CalCCA) submits this letter to the Commission to express support for GRID Alternatives' (GRID) Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

CalCCA is a trade association that represents the state's Community Choice Aggregators (CCAs). More than 170 communities (cities, towns, counties) in California are providing CCA service to more than 10 million customers — numbers that will see significant growth in 2020-2021. GRID and CCAs share a common goal of making clean energy and green jobs accessible to underserved communities and have collaborated on several initiatives to advance solar access to low-income customers and communities (list of projects on page 2).

CalCCA agrees with GRID's assertion that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. Changing the income eligibility for DAC-SASH to 80% AMI, as GRID recommends in the PFM, would allow more low-income homeowners to take advantage of solar technologies, better achieving the aims of D.18-06-027.

The 80% AMI definition models the current SASH program and more equitably addresses the extremely wide variance among cost-of-living in California. As it now stands, the DAC-SASH program unfairly excludes low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, and San Diego, for example.

We support GRID's petition for expanding this program because it will include communities that need critical access. We appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Beth Vaughan  
Executive Director, CalCCA



The list below is a brief summary of GRID Alternatives' work with CCAs to date summarized by category.

### **Low-Income Single-Family and Multifamily Solar**

- Gap funding for low-income single-family homes (MCE, Monterey Bay Community Power)
- Gap funding for multifamily affordable housing (MCE)
- Co-marketing for no-cost solar programs (MCE, Sonoma Clean Power, Redwood Coast Energy Authority)

### **Electric Vehicles**

- Funding for free or highly subsidized EVs for community organizations (Sonoma Clean Power, Lancaster Choice Energy)
- Low-income incentives for EVs and free chargers (Sonoma Clean Power)
- Funding for single family & multifamily charging infrastructure (MCE, Redwood Coast Energy Authority)
- Technical assistance for multifamily charging infrastructure (MCE, Peninsula Clean Energy)

### **Energy Efficiency & Other**

- Energy efficiency audits and rebates for multifamily affordable housing (MCE)
- Funding for main service panel upgrades (pending)

### **Low-Income Community Solar**

- Pilot Community Solar FiT project (MCE, San Joaquin test project)
- Advising on Community Solar Policy and partnering on CSD grant (Clean Power Alliance)