

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

Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for the California Solar Initiative

RULEMAKING 06-03-004  
(Filed March 2, 2006)

**COMMENTS OF GREENLINING INSTITUTE ON JOINT WORKSHOP ON  
CALIFORNIA SOLAR INITIATIVE AND AFFORDABLE HOUSING**

**A Missed Opportunity: Reply Comments to Joint Workshop on CSI and Affordable Housing**

The June 13 workshop was a good idea, but the workshop failed to maximize its potential to address the concerns of low-income communities.

The failure of the workshop is, in part, a failure of the CPUC to lead in the solar energy discussion as it affects renters, low and moderate income families, immigrant families and our state's 20 million minorities. As a result of this CPUC failure to develop a vision that makes sense to the 70% of Californians who live from paycheck to paycheck, the community representatives from these communities generally refused to participate and will continue to refused to participate. Equally disturbing, even those who participate will soon grow weary of the struggle and the developers – not the residents – will prevail.

At the end of the workshop, many panelists commented that low income residents were not present in these discussions. The answer is simple: the CSI has yet to engage the interest of low and moderate income residents, almost all of whom believe that solar energy is a toy for the rich. The reality is that it could become just that, a toy for the rich, unless the CEC and CPUC aggressively, clearly and, if possible, unanimously embrace the idea that the solar energy program can only be a success if it provides direct benefits to all Californians.

As mentioned in the June 13<sup>th</sup> workshop, there is much that can done to assist affordable housing developers in bringing solar energy access to low income households. However there are many opportunities that have been addressed which could increase access to solar energy for low to moderate income homeowners, renters, and millions of other California households which struggle to pay their energy bills. Greenlining Institute therefore recommends that the CSI include the following mechanisms:

Use the wealth and expertise of the banking industry

On June 14<sup>th</sup>, senior management from the six largest banks doing business in California met with CPUC Commissioner Bohn to deliver a message that should be heartening to

the Commission. The banks stated that they were ready to participate in the financing of a program that could bring to the poor what has already been brought to many of the most wealthy citizens of this state (The banks participating, representing \$4 trillion in assets, were Bank of America, Citigroup, Wells Fargo, Washington Mutual, Union Bank, and Bank of the West). But without direction from the entire Commission, Commissioner Bohn could give no direction to the banks as to what their future role could be. Greenlining believes the banks are prepared, if the CPUC will provide to them the appropriate incentives and financial structures, to take a leading and immediate role in designing a program that will ensure that the 70% of Californians who live from paycheck to paycheck, including the state's 20 million minorities, fully and enthusiastically participate in the state's solar energy program.

### Increasing Solar Energy in Low Income Homes

The percentage of funding to benefit solar projects for low income homes should be proportionate to the low income population across the state. Rebates for solar energy for low income customers should be increased to cover at minimum 50% of their costs to purchase solar panels. As mentioned by several participants in the workshop, these rebates should not decrease over the duration of the CSI.

PV panels should be given at no-cost to low income customers through the CSI, either in the form of monetary grants covering 100% of costs or in donation of solar energy products. While there are various options to make rebates more consumer-friendly, many low income customers can not afford any part of the costs of solar panels because they are already struggling to pay their exorbitant energy costs.

### Creating Comprehensive Benefits for All Low Income Customers

As it was stressed by several participants in the workshop, there is need and opportunity for solar energy to be integrated into energy efficiency mechanisms. Greenlining proposes an innovative perspective to energy efficiency that is based on energy usage per household member, as opposed to the current view of household energy usage on the appliances. This perspective accounts for the fact that low income families, which generally live in smaller households with a greater number of household members, have less energy usage than large homes with energy efficient appliances.

Greenlining Institute recommends that the CSI collaborate with low income energy programs such as Low Income Home Energy Assistance Program through the Department of Energy, and Low Income Energy Efficiency and CARE programs of the utilities companies. This collaboration could serve to provide no cost solar energy products, energy efficiency services for solar energy recipients, and to provide a streamlined point of access for low income customers who want to reduce their energy bill.

Additionally, low income customers should be able to benefit from the utilities' savings generated from solar energy. Households with solar panels should be able to have their

net-metered energy that would traditionally go into the utility grid, go to low-income households, so that these families can also save on the energy bills. This proposal could be implemented in a program similar to the PGE's REACH program and SMUD's EnergyHelp program, which allow customers to make contributions towards bill assistance for low income customers.

### Assertive Marketing Campaign

Many affordable housing developers still do not know about this program and it is virtually unheard of among residential customers. Without marketing, the only customers who are accessing the benefits are those who would have purchased solar energy even without the new incentives. The low income incentive must be marketed to the public, or otherwise the people who most need access to the largest rebates will not ever learn about the program.

Last month, Greenlining Institute collaborated with PGE to host a forum titled, "Solar Energy for All" which brought together over 25 people, affordable housing developers, affordable rental housing developers, solar energy organizations, foundations, advocates for low income communities, and community residents. Greenlining Institute intends to host similar discussions in the next several months, and plan to host them across the state. The last forum not only informed participants of the CSI and its benefits, but most importantly, collected feedback on ways to enhance the program to meet community needs. The partnership between utility company and community organizations was fruitful, providing a very productive discussion on the ways that forum participants, utilities companies, and Commissions could act to create an more beneficial CSI. The CPUC and CEC should adopt similar outreach tools and secure the support of Edison and Sempra.

### **Conclusion**

It is Greenlining's position that the CSI will work most successfully when it adopts multi-pronged incentive strategies that offer low interest financing, grants or no-cost solar products, and rebates to customers and affordable housing developers. Further workshops should be held to discuss these issues. For the CSI to achieve its goal, these issues must be resolved quickly. But first, the CPUC and CEC commissioners must express their larger vision as they assume a major leadership role.

Dated: June 20, 2006

Respectfully submitted,

/s/ Nonya Collier

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Greenlining Institute

**Certificate of Service**

On June 20, 2006, I served the within document, **COMMENTS OF GREENLINING INSITUTE ON JOINT WORKSHOP ON CALIFORNIA SOLAR INITIATIVE AND AFFORDABLE HOUSING**” in R.06-03-004, with service pursuant to the electronic protocols adopted for R.06-03-004. A copy of the electronic mail service list is attached.

Executed on June 20, 2006, at Berkeley, California.

/s/ Nonya Collier

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