

LOCAL
CLEAN
ENERGY
ALLIANCE

Jessica Guadalupe Tovar
339 15th St Suite 208
Oakland, CA 94612
415-766-7766
jessica@localcleanenergy.org

April 15, 2024

Subject: [Item 17. Ava Solar Billing Plan - Action Item](#) (Net Energy Metering)

Dear Board of Directors of Ava Community Energy,

We, the undersigned allies of East Bay Clean Power Alliance, ask you to **postpone a decision** on the staff proposal that allocates \$8.4 Million over the next 5 years on adders to the PG&E Solar Billing Plan (SBP). By matching PG&E's Base SBP developed from the CPUC decision to devalue the export price of solar from the retail to wholesale cost per kWh, Ava Community Energy will save millions of dollars that would normally have been paid to customers under NEM 2.0. We are grateful that Ava Community Energy is considering creative ways to best use these now available funds in ways that provide equal value while addressing the particular needs of its customers. However, we have some concerns regarding accessibility and prioritization of the current adder program.

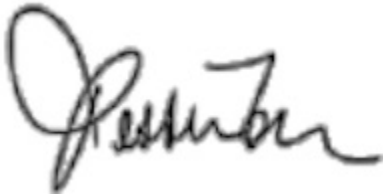
While it is unclear from the staff presentation how much the Capacity-Based Battery Storage program would cost and we are encouraged to hear that the program will include multipliers for CARE/FERA and other low income customers, the proposed adders, particularly for CARE/FERA customers are so minimal (10% reduction on bill) that they would not significantly reduce the payback time and therefore not increase accessibility of solar. Furthermore, the larger of the two adders, for exports between 3-8pm requires customers to have storage in addition to solar to take advantage of it. These conditions render the adders completely unusable for most low income communities. Unfortunately, Ava Community Energy has a history of creating partial incentive and rebate programs that require disposable income and, as such, are non-starters for low income people. We ask the agency to think more creatively and equitably.

Given Ava Community Energy's mandate from the Local Development Business Plan to prioritize equity and disadvantaged communities, the agency should be considering not only how to best incentivize rooftop solar and storage for customers but also how to do so in a way that also advances equity and access. As a public agency, Ava Community Energy should make use of the flexibility it has gained to design an accessible and equitable allocation of \$8.4 Million that would previously have been paid out to solar customers via NEM 2.0. By rough estimate, this could pay for direct installation of completely paid for solar on 500 homes in Ava Community Energy service territory.¹

¹ Using public works adjusted rates of \$3.50/W, \$8.4 million can pay for 2400 kW of installed solar. Standard 400W per panel, 12 panel solar systems would mean 500 homes could be outfitted with solar at no cost to customers.

Comments made by Board Members and the public at the executive board meeting on November 1, 2023, indicate interest in a grant or financing direct install program for both solar and storage with priority for low income customers. Considering staff's existing proposal for a Capacity-Based Battery Storage Program, we suggest that Ava Community Energy staff reallocate funds slated for adders to a completely paid for solar direct install program targeted towards those for whom statewide and federal rebate, incentive or subsidy programs are inaccessible. Furthermore, this incentive program should specifically target solar to low income customers that have significant daytime use, to ensure maximum value from the solar installation. We argue such a program would be a more impactful allocation of available funds and will be more effective in providing equity. We would also welcome a program that provides working-class and middle-class customers the opportunity to stack incentives that enhance the monetization pathway available for multiple distributed energy resource types, including a robust pathway toward microgrid adoption. This could strengthen existing solar systems for low-income people like the SOMAH program (Solar on Multi-Affordable Housing) which is currently solar without battery storage. Finally, we recommend that Ava Community Energy roll out the Base SBP on the same timeline as PG&E to avoid any potential confusion and develop both the Capacity-Based Battery Storage Program and a Low Income High-Daytime Use Direct Install Solar Program within the second quarter of 2024.

Thank you very much for considering this needed adjustment to advance equity and accessibility to bring, "Clean Power to the People."

A handwritten signature in black ink, appearing to read 'Jessica Tovar', written in a cursive style.

Jessica Guadalupe Tovar, East Bay Clean Power Alliance