



California's Solar for Multifamily Affordable Housing (SOMAH) Program

Collaboration between Community Organizations and State Energy Agencies

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NOVEMBER 2022





About this Report

Clean Energy States Alliance (CESA) developed this white paper to highlight an example of how a state energy agency can work with community-based organizations to more equitably deploy solar programs.

CESA Project Director Abbe Ramanan collaborated with Ayesha Abbasi of the Asian Pacific Environmental Network (APEN) to produce this white paper. APEN was a sponsor of the enabling legislation for the Solar for Multifamily Affordable Housing Program and continues to operate as a subcontractor of the Program Administrator. Sections written by Ayesha are credited where they appear in the white paper.

In addition, individuals from the California Public Utilities Commission, California Environmental Justice Alliance, Center for Sustainable Energy, Communities for a Better Environment, the Environmental Health Coalition, GRID Alternatives, and Self-Help Enterprises were interviewed for this report and several quotes from those interviews are included.

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Cover: Oscar, a SOMAH job trainee, supports the solar installation at Loma Sierra Apartments in Loma Linda, CA.
Photo: Marissa Leshnov.

Acknowledgements

The authors would like to thank the following organizations and individuals for contributing their thoughts, expertise, and feedback to the development of this white paper. Their contributions have been invaluable to this report:

California Public Utilities Commission

Tory Francisco, Program and Project Supervisor and Sarah Lerhaupt, Senior Public Utilities Regulatory Analyst

California Environmental Justice Alliance

Shina Robinson, Resilience Hubs Manager at Asian Pacific Environmental Network and Tyler Valdes, Program Manager—SOMAH

Center for Sustainable Energy

Jacqueline Berg, Director, DER Programs, Margaret McDonnell, Associate Manager—SOMAH and Hannah Warner, Senior Manager—SOMAH

Communities for a Better Environment

Terez Sanogo, Multifamily Affordable Housing Outreach Coordinator and Adele Watts, SOMAH Outreach Associate

Environmental Health Coalition

Monica De la Cruz, Marketing, Education & Outreach Coordinator, SOMAH

GRID Alternatives

Staci Hoell, Senior SOMAH Workforce Development Manager; Sarah Salem, Director of Community Engagement and Partnerships; Sana Sheikholeslami, Tenant Education & CBO Partnerships Specialist; and Christopher Walker, Senior Director, Program Administration

Self-Help Enterprises

Armando Ortiz, Energy Project Manager and Maria Dolores Reveles, Project Manager

Additionally, Warren Leon, Executive Director and Maria Blais Costello, Manager of Program Administration of CESA, provided input and assistance with the report's production, along with David Gerratt of DG Communications.

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Introduction

California's Solar for Multifamily Affordable Housing (SOMAH) program is an excellent example of how state energy agencies (SEAs) and community-based organizations (CBOs) can work together to create more impactful and sustainable solar programs that provide the maximum benefit to environmental justice (EJ) communities.

CBOs, in partnership with state legislators and the California solar industry, successfully pushed through the enabling legislation for SOMAH, which provides financial incentives for installing solar photovoltaic (PV) systems on multifamily affordable housing in California. CBOs have continued to play an important role in the development and implementation of the program.

This extensive involvement was facilitated by the California Public Utilities Commission (CPUC) selecting a SOMAH Program Administrator comprised of several mission-aligned nonprofit organizations, including GRID Alternatives, Center for Sustainable Energy, the Association for Energy Affordability, and California Housing Partnership Corporation.



The solar energy system at Sand Creek Apartments in Orosi, CA.
Photo: David Lee-Burleigh

The collaborative efforts of CBOs, the Program Administrator, and the CPUC work to ensure that as SOMAH progresses, it continues to meet the needs of affordable housing residents in California EJ communities.

The Program Administrator brought on several CBO partners, including the Asian Pacific Environmental Network (APEN), California Environmental Justice Alliance (CEJA), Communities for a Better Environment, Environmental Health Coalition and Self-Help Enterprises. APEN was also a co-author of this report. These CBOs work with the Program Administrator to conduct community outreach and education for the program. There is also an Advisory Council, consisting of several stakeholder organizations of SOMAH, that regularly provides feedback on the program. The collaborative efforts of CBOs, the Program Administrator, and the CPUC work to ensure that as SOMAH progresses, it continues to meet the needs of affordable housing residents in California EJ communities.

This white paper contains an appendix that provides key take-away information and recommendations on how SEAs and CBOs can work together to design and implement effective solar programs.

Background

California has often been at the forefront of clean energy. The California Global Warming Solutions Act, passed in 2006, created a market mechanism for the auctioning of greenhouse gas (GHG) allowances for utilities and stipulated that 15 percent of the revenues from that auction would go to clean energy and energy efficiency projects.¹ This mechanism, known as the California Greenhouse Gas Cap-and-Trade Program, has helped to foster California’s clean energy transition. California Senate Bill 1, which was also passed in 2006, authorized the CPUC to create the ratepayer-funded California Solar Initiative (CSI), a rebate program to incentivize solar PV on homes and commercial buildings;² the CSI was launched in that same year. Several solar incentive programs were developed under CSI, including the Multifamily Affordable Solar Housing Program (MASH) in 2008, which was created to foster the adoption of solar power in the affordable multi-family housing sector, and the Single-family Affordable Solar Homes Program (SASH), which was created to foster the adoption of solar on affordable single-family housing.³

Despite these clean energy programs and incentives, including MASH and SASH, the penetration of solar into disadvantaged communities (DACs) in the state remained low.⁴ In 2015, only about 6 percent of residential solar could be found in California’s DACs.⁵ The disparities in solar installation between wealthier communities and DACs were telling—despite the creation of these incentive programs, access to the benefits of solar remained unobtainable for many. This inequity was deeply felt by California’s environmental justice advocates, who linked this lack of access to the ongoing housing, public health, and economic crises faced by members of their communities.

In 2015, only about 6 percent of residential solar could be found in California’s disadvantaged communities (DACs).

1 California Public Utilities Commission, “California Solar Initiative (CSI),” [cpuc.ca.gov](https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative), December 31, 2016, <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative> (accessed September 30, 2022).

2 Ibid.

3 California Public Utilities Commission, “CSI Multifamily Affordable Solar Housing (MASH) Program,” [cpuc.ca.gov](https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative/csi-multifamily-affordable-solar-housing-program), January 8, 2021, <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative/csi-multifamily-affordable-solar-housing-program> (accessed September 30, 2022).

4 The term “disadvantaged communities” refers to the areas throughout California which most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes as well as high incidence of asthma and heart disease, as identified by [CalEnviroScreen 4.0](#).

5 CaliforniaDGStats, “Multifamily Affordable Solar Housing Program 1.0 and 2.0,” [californiadgstats.ca.gov](https://www.californiadgstats.ca.gov/charts/li/), <https://www.californiadgstats.ca.gov/charts/li/> (accessed July 1, 2022).



Faliz, a resident at Cottonwood Creek Apartments in Suisun City, CA, attends a ribbon-cutting ceremony for the solar energy system installed at Cottonwood Creek Apartments.

Photo: Marissa Leshnov

In addition to general concerns about the unequal distribution of solar installations across the state, there were also specific issues related to the structure and implementation of MASH. MASH provided rebates to affordable housing building owners in the form of a one-time lump sum. This sum was calculated based on a formula under the CSI program that incentivized systems at \$1.10/watt for systems serving less than 50 percent of affordable housing tenants' load. If the system served more than half of the tenants' load, the incentive was at \$1.80/watt for the portion of the system offsetting the tenant load.⁶ Although MASH provided a slightly higher incentive for systems that benefited tenants, many building owners chose not to extend the electricity of the building's PV system to tenant units due to the increased costs associated with doing so. This allowed building owners to be gatekeepers to the benefits of solar energy for their tenants, limiting the role affordable housing residents could have in the clean energy transition.

MASH and SASH helped lay the groundwork for increasing low-income solar access and maximizing the benefits of solar for all ratepayers. In 2009, the CPUC added a virtual net metering tariff to MASH to ensure that tenants could benefit from solar energy installed in their building if the system was built to support their units. Through virtual net metering, tenants who were receiving solar credits were able to save an average of \$480 off their

MASH and SASH helped lay the groundwork for increasing low-income solar access and maximizing the benefits of solar for all ratepayers.

⁶ U.S. Environmental Protection Agency, State and Local Climate and Energy Program, "Case Study: California Multifamily Affordable Solar Housing Program- Benefitting Both Owners and Tenants," epa.gov, June 1, 2016, 8, https://www.epa.gov/sites/default/files/2017-06/documents/epa_low_income_program_guide_508_2-29-16.pdf (accessed September 30, 2022).

energy bills annually.⁷ Based on positive responses from both program participants and external stakeholders, the CPUC later created a similar net metering tariff that would apply to solar on all multifamily buildings, not just affordable housing. In addition, the CSI program built in requirements for extensive data collection and reporting for all its programs, including MASH. The feedback loops created by this requirement allowed the CPUC to oversee the program and its many stakeholders effectively and created a wealth of data on low-income solar implementation in the state of California. This data has been critical for ensuring that all low-income solar programs maximize benefits to all ratepayers.

MASH set the stage for a new solar program that could better address the needs of affordable housing tenants and support underlying principles of environmental justice, including maximizing community participation. The California Environmental Justice Alliance (CEJA) argued that solar could be a powerful tool for communities to reclaim their power in the energy generation system and fight back against decades of harm at the hands of fossil fuel generation. Campaigns such as Solar for All, which CEJA had been leading since 2011, had helped build grassroots support for solar in California’s environmental justice communities.⁸ This grassroots support, coupled with solar industry interest and allies in the legislature, set the stage for the development of the SOMAH Program, which built on MASH and SASH.

MASH set the stage for a new solar program that could better address the needs of affordable housing tenants and support underlying principles of environmental justice, including maximizing community participation.

7 Navigant, “California Solar Initiative - Biennial Evaluation Studies for the Single-Family Affordable Solar Homes (SASH) and Multifamily Affordable Housing (MASH) Low-Income Programs Impact and Cost-Benefit Analysis Program Years 2011–2013,” December 1, 2015, cpuc.ca.gov, <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/n/9323-navigant-csi-sash-mash-impact-and-cost-benefit-analysis-2011-2013.pdf> (accessed September 30, 2022).

8 California Environmental Justice Alliance, “Solar for All Fact Sheet,” February 2, 2012, cbeal.org, <https://www.cbeal.org/wp-content/uploads/2012/02/Solar-For-All-Fact-Sheet-.pdf> (accessed September 17, 2022).

PARTNERSHIP IN ACTION

SOMAH Legislation Development

One of the hallmarks of SOMAH has been the central role of partnerships between CBOs, SEAs, and the solar industry in each stage of development. SOMAH began as Assembly Bill (AB) 693, authored by California Assembly-member Susan Eggman. She had already been in conversation with the California Solar Energy Industries Association (CalSEIA), which also supported a program that would expand upon the solar incentives put forward by MASH and SASH. CalSEIA brought CEJA into the development of AB 693. CEJA, along with partner organization APEN, was prepared to effectively support a bill like AB 693 thanks to years of work developing contacts within the legislature and advancing the conversation on environmental justice issues.

Bringing both CEJA and APEN into the development process of AB 693 was a key factor in the bill's successful passage. As CBOs, both CEJA and APEN were well versed in advocating for the needs of their communities and educating policymakers on the shortcomings of existing solar policies. AB 693 built on the regulatory frameworks put in place by MASH and SASH, while including key programmatic components to address those programs' gaps in securing benefits for affordable housing tenants and DAC residents. AB 693 included a budget for the program of up to \$100 million annually over 10 years from the electric utilities' Greenhouse Gas auction proceeds (these funds are separate from the California Greenhouse Gas Cap-and-Trade Program). The current incentive levels in 2022 for solar customers range from \$1.49 to \$2.97 per AC watt for load serving affordable housing tenants and \$0.56 to \$1.02 per AC watt for load serving affordable housing common areas, depending on tax credit usage, with a step-down each year. The bill also encouraged solar system installations in DACs.



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One of the most unusual things about AB 693 was that it had an explicit goal of using incentivized solar systems to lower tenant energy bills. The bill required that generation funded by SOMAH primarily be used to offset electricity usage by low-income affordable housing tenants. Although MASH had a greater incentive for solar installations that provided direct benefits to tenants, SOMAH was the first program to require providing direct benefits to tenants through virtual net metering. Given the novelty of this program requirement, some lawmakers were hesitant to move forward with the program. Several suggested that instead of creating a program with \$100 million in funding annually over 10 years, the legislation should instead start with a pilot program. CBOs played a vital role in overcoming this pushback, as described by Ayesha Abbasi of APEN in the side box, “How Grassroots Organizing Helped Shape Legislation.”

Thanks to the direct efforts of the coalition of CBOs led by APEN and CEJA, AB 693 was signed into law in October 2015 without watering down the scale of investment, length of the program, or requirements for direct tenant benefits.

Thanks to the direct efforts of the coalition of CBOs led by APEN and CEJA, AB 693 was signed into law in October 2015 without watering down the scale of investment, length of the program, or requirements for direct tenant benefits. This was also a huge achievement for the solar industry and for lawmakers. As Assemblywoman Susan Eggman put it, “The impacts of the program go well beyond its contribution to [California’s] clean energy mix. It leaves more money in families’ pockets and makes housing more affordable, provides growth opportunities for local solar businesses, and creates jobs. It’s a win-win for everyone.”⁹

BOX 1

How Grassroots Organizing Helped Shape Legislation

By Ayesha Abbasi, Asian Pacific Environmental Network (APEN)

CEJA and APEN’s grassroots experience provided an important catalyst for AB 93’s passage. APEN’s State Organizer Ayesha Abbasi describes how the group helped push forward their vision for the bill.

We built a broad coalition of supporters based across the state but active in advocacy in Sacramento. The coalition included environmental justice organizations, large environmental and conservation groups, solar industry and energy efficiency companies, housing advocates, utility reform and ratepayer advocates, scientists, and faith groups. APEN’s Policy Director was camped out in Sacramento nearing the end of session to coordinate with CEJA’s efforts, keep pushing for votes, and build relationships with key elected officials to build foundations for champions among the Asian and Pacific Islander (API) Caucus.

9 Ibid.

We executed inside-outside tactics¹⁰ through coordinated advocacy days, which included bringing members to the capitol for lawmakers to hear directly from the frontlines. We helped bring coalition members to Sacramento before key votes in committees and on the Assembly or Senate floors. The biggest opportunity and show of strength in the EJ movement was through the CEJA Congreso, an annual conference. In 2015 the Congreso was themed, “People, Power, Policy.” It was held for two days in August, near the end of the legislative session, and featured workshops, cultural performances, members across organizations building relationships, and a “storm-the-capitol” lobby day with over 250 community leaders participating. APEN served on the planning committee. APEN facilitated the direct involvement of 33 staff, youth, grassroots member leaders, interpreters for four languages, and allies.



SOMAH CBO Partners, Asian Pacific Environmental Network (APEN), Communities for a Better Environment (CBE), and California Environmental Justice Alliance (CEJA) host a workshop on SOMAH at the Oakland Public Library.

Photo: Marissa Leshnov

We were able to bring in allies from additional statewide networks we had been building through civic engagement and capacity building with Asian American organizations. Staff participated as lobby team leads, guiding members and allies through the lobbying process. We heard a lot of positive feedback from the offices visited as elected officials and their staff were really moved by advocates and community members’ stories about the impacts of the climate crisis on their health, housing, and neighborhoods. We also heard a lot of positive feedback from members who were excited to be able to speak directly to decision-makers to share their ideas and grow their skills as advocates for their communities at this scale.

Because the bill started late in the legislative process and we were turning things around quickly, a lot of outside work was done through communication and sharing the values of the policy with supporters, allies, and the public. During the legislative session we practiced smarter messaging and narrative frameworks on legislative campaigns. By not tying the messaging to the legislation, but to the demands within, we were able to more clearly articulate the values represented by the bill and reach more people. We also put our integrated voter engagement to use. APEN consistently runs phone banking programs in at least three Asian languages at a time. We are growing the skills of our multilingual canvassers who come back campaign after campaign. With that skill, voters responded and were able to get through to elected officials when additional pressure was needed before a vote.

¹⁰ “Inside-outside tactics” refer to an organizing strategy that emphasizes learning from and coordination with different movements and parties. It focuses on mass organizing to empower those “outside” of centers of power.

PARTNERSHIP IN ACTION

SOMAH Program Design

Once AB 693 was signed into law, it fell to the CPUC to create the SOMAH Program. Again, partnerships with CBOs were a key part of this proceeding. The program design proceeding was stakeholder heavy and part of a public process that solicited input from both the CBOs involved in the enabling legislation, industry groups, and other groups of ratepayers.

Outside of working directly with the CPUC, CEJA member organizations (including APEN) continued to build on the public advocacy they had galvanized to get AB 693 passed in the first place. CEJA organizations organized “Energy Equity Tours,” highlighting affordable housing communities around the state, as well as an advocacy day at the CPUC for community members to speak directly to commissioners regarding the implementation of AB 693. APEN hosted a solar tour around Richmond to highlight buildings that would be eligible for SOMAH and to have community leaders speak directly to commissioners, CPUC staff, elected officials, and environmental allies. These CBO-led interactive tours and speaking events could be more impactful than standard public engagement proceedings, which are usually day-long technical hearings held in Sacramento. By bringing state agency staff directly into the areas that SOMAH would impact, community members felt more comfortable discussing their concerns directly. These experiences were also memorable for staff and provided valuable experiences that would carry forward into SOMAH’s design and implementation.

While many solar programs are administered by an investor-owned utility (IOU) or private



Residents at Sand Creek Apartments in Orsi, CA attend a ribbon-cutting ceremony to celebrate the successful installation and permission to operate the 128-kW CECAC solar energy system at Sand Creek Apartments.

Photo: David Lee-Burleigh

third-party, the winning bid for administering SOMAH came from a team of nonprofits consisting of the Center for Sustainable Energy, Association for Energy Affordability, GRID Alternatives, and the California Housing Corporation. The Program Administration team made including CBOs into SOMAH's implementation a priority. This included funding for four to five CBOs to support the program implementation process. The CBOs help with educating tenants, conducting community outreach, and facilitating the workforce development requirement of the program. The SOMAH Program Administrator was able to bring in several CBOs through existing relationships, including APEN, Communities for a Better Environment, Environmental Health Coalition, and Self-Help Enterprises. For CBOs, having nonprofits serve as the Program Administrator, as opposed to for-profit entities, made a huge difference in the level of trust built into the relationship.

According to Armando Ortiz, energy project manager at Self-Help Enterprises: "You're dealing with the bottom line of a nonprofit instead of the bottom line of a company. There is greater trust working with a nonprofit organization such as GRID Alternatives. . . . We have shared values such as diversity and equity, beyond just solar. There is a focus on DAC communities and moving them forward, with less gatekeeping."

Beyond involving CBOs in the program administration portion of SOMAH, the program also created an advisory council. This advisory council consists of 10 individuals from affordable housing and environmental justice organizations and provides quarterly feedback on the program. The organizations involved in the council are compensated for their participation. The organizations represented on the council include Self-Help Enterprises, Strategic Concepts in Organizing and Policy Education (SCOPE), Pacoima Beautiful, BlueGreen Alliance, O&M Solar Services, Energy Efficiency Council, Coalition for Economic Survival, Northern Circle Indian Housing Authority, The Niles Foundation, and California Indian Museum and Cultural Center. Alma Marquez, a community leader and climate change advocate, also sits on the council.¹¹

The council provides another layer of feedback for SOMAH to ensure the program stays true to its initial spirit of equity. Sarah Lerhaupt, Senior Public Utilities Regulatory Analyst at the CPUC who oversees SOMAH Program administration, says, "The advisory council's role is to highlight how to implement best practices when it comes to equity and justice and how a program can operate to ensure it is equitable."

Because of lengthy negotiations between the program administration team and the different IOUs (PG&E, Southern California Edison, and SDG&E) involved in administering the funds, SOMAH did not officially launch until 2019. APEN and the other CBOs on the program administration team were still active during the years between SOMAH's conception and its actual implementation, conducting community outreach and education to prepare affordable housing owners and tenants to take advantage of SOMAH when it did kick off. This work is described by Ayesha Abbasi of APEN in the side box, "Maximizing Community Outreach and Participation."

¹¹ California Public Utilities Commission, "SOMAH Advisory Council," [calsomah.org](https://calsomah.org/advisory-council), <https://calsomah.org/advisory-council> (accessed July 25, 2022).

BOX 2

Maximizing Community Outreach and Participation

By Ayesha Abbasi, APEN

Ayesha Abbasi, state organizer for the Asian Pacific Environmental Network, explains how CBOs assisted with community engagement prior to the SOMAH program's rollout.

Before the launch, [APEN] started preliminary conversations with affordable housing developers, prioritizing where our members live in Oakland and Richmond. Because of the huge sum of money involved, we knew the program would be in high demand and wanted to make sure affordable housing developers in our areas were able to apply. Many were concerned about upfront costs, what it would take to apply, and how to fit in with timelines of re-syndication as they pull together funding to do other upgrades. It required expertise building on our end to learn about utility bills, roof capacity, retrofit planning. . . .

The SOMAH Program was also created with a first come, first served application process, which was not conducive to equity. The program was fully enrolled in the first year with waitlists in PG&E, SCE, and SDG&E territories, with most applications submitted by eight



Ayesha Abbasi of the Asian Pacific Environmental Network (APEN) and the SOMAH Tenant Services team prepare to lead a SOMAH Education Workshop in Stockton, CA.

Photo: Sana Sheikholeslami

Our role as subcontractors is crucial in continuing to both act as a tenant equity advisory council to the overall program administration team and do the direct outreach with cultural competency and on the ground relationships.

solar developers across the state with a focus on very large buildings. Our role as subcontractors is crucial in continuing to both act as a tenant equity advisory council to the overall program administration team and do the direct outreach with cultural competency and on the ground relationships to ensure the program gets to tenants in smaller buildings and whose owners don't have the resources on the ready. We are also working hard to ensure projects in environmental justice communities are prioritized as the program moves forward, along with local and targeted hires from these communities, including residents of the buildings themselves.

Outside of directly providing feedback and shaping the program, APEN and the CBO teams do community outreach and implementation through community workshops, tabling at events, and online. APEN took on state-wide work in coalition with other Asian and Pacific Islander and environmental justice groups in the Central Valley and Los Angeles to host SOMAH workshops for tenants and organizers across labor and energy sectors. We include direct information about the program, including information about bill savings and job trainee opportunities, and we put it into a broader strategy of a Just Transition and the California Green New Deal.

PARTNERSHIP IN ACTION

Addressing Program Challenges

The delay in starting the program was not the only obstacle SOMAH encountered.

The program was only in place for a year when the COVID-19 pandemic began. This challenged the program administration team on multiple fronts. Many of the CBOs involved in implementing SOMAH were forced to pivot to the more immediate needs of their communities, as residents dealt with job losses, food insecurity, high rates of COVID infection, social isolation, and targeted racism. Social distancing measures made community

outreach and education difficult. The ripple effects of the pandemic also impacted SOMAH projects that tried to get off the ground, as supply chain shortages limited the availability of solar panels. In such a difficult operating environment, the strong partnership between the SOMAH Program Administrator and the CBOs on the program administration team was invaluable. Originally, the CBOs each had a one-year contract, with the intention that new CBOs would be swapped in every year. However, GRID Alternatives, which was overseeing the CBOs, saw that this model would not work—it took about six months to onboard the CBOs, and then once the team was ready to begin outreach, the pandemic hit. GRID was able to advocate on behalf of the CBOs to push the re-contracting process another year and to have a third year with the original four CBOs. GRID also advocated for adding another organization, Rising Sun, an organization that manages job training relationships across California, to the team.

For the CPUC, SOMAH's development reflects values that were highlighted in its Environmental & Social Justice Plan, which serves as a framework for incorporating environmental and social justice principles into the agency's work. A primary goal of the plan



Emerald Cove resident Gerry with their building's newly installed solar energy system.

Photo: Sarah Salem

was to highlight the low-income communities and communities of color that had been traditionally locked out of the CPUC's policy-setting and decision-making processes.¹² Through this, the CPUC could evaluate the importance of CBOs involved in a program like SOMAH, and the valuable community engagement resources and knowledge of communities' lived experiences they could provide.

Since its kickoff in 2019, few projects have been completed under SOMAH as of fall 2022 due to the delays mentioned previously. However, when completed, the number of projects with currently active applications under the program will generate 43.3 megawatts and 4.9 megawatts of solar generation during the California ISO's 2020 gross and net peak hours, respectively, and reduce greenhouse gas emissions by 23,670 metric tons annually. SOMAH projects are expected to reduce common area monthly bills by about \$2,000 (70 percent of previous bills), and tenant's monthly bills by around \$50 (80 percent of previous bills).¹³

BOX 3

The Multiplier Effect of CBO Involvement

By Ayesha Abbasi, APEN

Ayesha Abbasi of APEN discusses the benefits of CBO involvement for successful program development and roll out:

Having access to the inside of the program is helping us learn the details of implementation (and of a billion-dollar program no less) and allows us to create space for equity as the program gets shaped. We also made sure things are not just translated correctly and competently but reoriented towards language justice and transparency as much as possible. Another positive outcome has been working in coalition with community-based organizations across California to make sure the program is being implemented equitably. APEN is contracted along with Communities for a Better Environment (CBE), Environmental Health Coalition (EHC), and California Environmental Justice Alliance (CEJA) which plays a coordinator role. Having this team to rely on and unify with gives us more negotiating power as well as allies as we work with the larger solar and energy groups comprising the program administration team.

This policy allowed for APEN to see a policy all the way through from an idea in the legislature through a proceeding in the rulemaking process and into full implementation, and we were able to innovate to bring in community power at every stage. So much can happen to legislation even after it passes and it takes so much capacity to engage in any one of these stages, but if we were not present at all of them, the program would not be as strong as it is. It could have been a small pilot project, it could have been another program for property owners, it could

12 California Public Utilities Commission, "Environmental & Social Justice Action Plan, Version 2.0," [cpuc.ca.gov](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf), April 7, 2022, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf> (accessed September 30, 2022).

13 Verdant Associates, LLC, "Solar on Multifamily Affordable Housing Phase II Report," [cpuc.ca.gov](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/somah/somah_phaseii_report_20211013_final.pdf), October 13, 2021, https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/somah/somah_phaseii_report_20211013_final.pdf (accessed September 30, 2022) (accessed September 30, 2022).

Another positive outcome has been working in coalition with community-based organizations across California to make sure the program is being implemented equitably.



Oscar, a SOMAH job trainee, supports the solar installation at Loma Sierra Apartments in Loma Linda, CA.

Photo: Marissa Leshnov

have gone to the utilities to run and siphon off the funding for themselves instead of solar for working class tenants. The Energy Equity Tours had a lasting impact on the CPUC, which now reaches out to us and invites us to be part of meetings and opportunities to improve SOMAH and other programs. Advocacy in the rulemaking stage created that opening for the team of CBOs to be awarded contracts to get resourced for continuing community engagement.

In the longer term, we do hope to continue working with tenants who receive SOMAH benefits. By doing community outreach and education about the program, energy efficiency, and tenants' rights now, we want to maintain a connection after solar panels are installed for those who want to help make more change.

Conclusion

Partnerships between CBOs, industry, and policymakers have been a key part of SOMAH from the program’s inception in the legislature through to implementation. This involvement was not only helped get AB 693 passed through public advocacy, but it also facilitated a truly equitable stakeholder engagement process during the program design phase. The CPUC’s Environmental & Social Justice Plan has helped to ensure public engagement is a priority in policy setting proceedings, but without the active involvement of CBOs like APEN, it is unlikely that events like the Energy Equity Tours would have occurred. These opportunities for residents of environmental justice communities to speak directly to agency staff, outside of a formalized hearing process, help to redistribute power and honor the learned experience of residents.

The CBOs’ involvement in the program administration process has not only been beneficial for SOMAH but has also helped build capacity at CBOs like APEN, which can then be carried over into other policy efforts. Ayesha Abbasi of APEN describes this impact in the side box, “The Multiplier Effect of CBO Involvement.”

While it is difficult to assess the full impact of SOMAH while the program is ongoing, the collaborative process through which the program was designed and implemented is already paying dividends. The CBOs involved have been able to scale their own capacity while also bringing in important representation from historically marginalized communities into the program design process. The SOMAH Program Administrator has a strong cohort of CBO partners for targeted outreach and education. The CPUC has received valuable feedback on how to continue to prioritize environmental justice communities moving forward, while ensuring SOMAH program dollars are going where they will be the most impactful. While SOMAH’s development is specific to California’s policy environment, the models of collaboration and lessons learned from this process can be applied everywhere.

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APPENDIX

Lessons Learned

While the SOMAH Program is unique to California, the collaborative process through which it was developed, designed, and implemented has valuable insights for both CBOs and SEAs in other states.

Key Takeaways for CBOs

Building State-wide Momentum Takes Time

Having a coalition of CBOs, each with its own strengths and networks, was instrumental in both getting AB 693 passed and ensuring SOMAH's most equitable provisions were retained from legislation through program design. It can be difficult for many CBOs to dedicate staff time to travel to the state capital and meet with lawmakers, which is often necessary to build relationships and identify opportunities for advocacy. APEN and CEJA had already been engaging with state policymakers since 2011 when they were invited to work on AB 693 in 2015. While there were not as many legislative wins during those four years, the CBOs were able to use one-on-one time with lawmakers to help shift the culture and perception of environmental justice issues at the statehouse, laying invaluable groundwork for passing AB 693.

Bring Policymakers to the Community

One powerful advocacy tool APEN and CEJA used during the design process for SOMAH was to bring policymakers into the communities that would be most impacted by the legislation. The Energy Equity Tours took policymakers out of their offices and allowed residents of the communities to speak directly to them. Not only did these tours create a lasting impression on state agency employees, but they also created an opportunity for community members to speak on their home ground as opposed to having to go to state offices. These tours also provided a valuable opportunity to highlight the SOMAH Program and identify which parts of the program most resonated with different members of the community, such as property owners or developers.

Identify Diverse Allies

Environmental justice CBOs and solar industry representatives were both involved in the development of AB 693 and the subsequent development of SOMAH. Depending on the

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context, CBOs and the solar industry in a state may have a complicated relationship, and partnerships may not always be feasible. However, if there are opportunities for partnership on specific programs or legislation, having the support of the solar industry can make it easier to highlight the value of a program. Having a diverse coalition of supporters beyond just CBOs, such as solar contractors, developers, or affordable housing property owners, can make it easier for SEAs who must consider the benefits of a program from multiple angles. Tory Francisco, program and project supervisor at the CPUC and formerly the lead analyst on SOMAH notes, “For us, it is most helpful when a program has a diverse coalition of contractors and CBOs working together. [The coalition] should also make it clear they care about costs and cost effectiveness.”

Of course, there can be a tension between representing the interests of industry and the interests of communities. In the case of SOMAH, having a nonprofit Program Administrator was one way this balance was protected. Monica De la Cruz, Climate Justice Associate at the Environmental Health Coalition, says, “[The program] is susceptible to being steamrolled by various interests. [The SOMAH Program Administrator] has been helpful in protecting it from that—making handbook changes, writing advice letters, and soliciting internal stakeholder engagement.” Having nonprofits which can function as a bridge between industry groups, CBOs, and SEAs can reduce the burden of engagement for CBOs and make communication easier.

“For us, it is most helpful when a program has a diverse coalition of contractors and CBOs working together. [The coalition] should also make it clear they care about costs and cost effectiveness.”

Tory Francisco, program and project supervisor at the CPUC and formerly the lead analyst on SOMAH

Key Takeaways for SEAs

Have a Guiding Framework for Engagement

The CPUC’s Environmental & Social Justice Plan provided a helpful foundation for ensuring community engagement was a priority in the development of SOMAH. Although the process for developing a framework to address environmental justice issues may differ across SEAs (particularly those with regulatory authority), having a framework can aid in setting agencywide priorities. Having a plan in place and available publicly also gives CBOs useful information regarding what they can expect from a program development process. The exercise of developing a guiding framework—including examining existing public hearing processes and opportunities for public comment—can highlight areas where an SEA has been struggling to involve CBOs. Reevaluating these public proceedings to ensure they are accessible can be just as valuable as setting programmatic goals such as increasing low-income solar participation.

Relationships with nonprofits like GRID Alternatives, Center for Sustainable Energy, the Association for Affordable Energy, and the California Housing Partnership Corporation can be helpful if a SEA has had limited experience working directly with CBOs. Organizations like these can play a valuable role in facilitating communication, although engaging with them is not a replacement for directly soliciting community input. Christopher Walker,

senior director of program administration at GRID and the SOMAH program manager, explains:

“Engage with CBOs early and often. Don’t assume the relationship based on your perception of it, but let the CBOs set the intention instead. Go to them—if your process is just ‘I’m going to have this webinar and see who shows up,’ you’re not going to be as successful as if you go out to a specific community of practice. You won’t get a diversity of perspectives.”

Avoid Overloading CBOs

When collaborating with CBOs on solar programming, it is important to be cognizant of the organizations’ limited time and capacity and prioritize areas where the CBOs could have the most impact. Many CBOs have extensive networks and deep expertise in the needs of their communities. However, not all CBOs have, for example, extensive technical knowledge regarding solar. Since many CBOs may have limited capacity to build technical expertise in energy, their time may be better spent on activities where extensive staff training is not required.

Similarly, CBOs who provide input on potential program issues or concerns during the development process should not be expected to come up with all the solutions to these issues. Be wary of deferring so much to CBOs that they become overburdened—a truly collaborative process requires all parties to be involved. It may be helpful to set guideposts before beginning the collaboration, so all parties are aware of their roles and the process does not get bogged down in decision fatigue.

Evaluate Frequently

A key part of the SOMAH team’s ability to adapt to unforeseen challenges like the COVID-19 pandemic has been the multiple levels of feedback and evaluation incorporated into the program’s administration. In addition to the five CBOs involved in the direct implementation of the program, there is also the advisory council, which provides quarterly feedback on the program to the CPUC. Additional CBOs are also compensated through the program to help spread the word about SOMAH through their networks.

These qualitative feedback loops are particularly important for adding context to quantitative evaluations of a program. The first three-year evaluation of SOMAH commenced in 2020 and was completed in October 2021. That assessment, led by a third-party evaluator, tracked the program’s process against key performance indicators (KPIs). However, given the infrequency of these evaluations, having ongoing feedback and flexibility to adapt aspects of SOMAH’s implementation is key. CBOs can provide important feedback and context on how the program is playing out in their communities, including perceptions from tenants and whether tenants are receiving benefits. This feedback is not easily captured by metrics alone.

“Engage with CBOs early and often. Don’t assume the relationship based on your perception of it, but let the CBOs set the intention instead.”

Christopher Walker, senior director of program administration at GRID and the SOMAH program manager

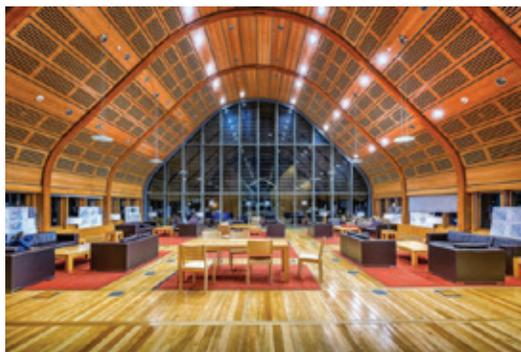
The Clean Energy States Alliance (CESA) is a national, nonprofit coalition of public agencies and organizations working together to advance clean energy. CESA members—mostly state agencies—include many of the most innovative, successful, and influential public funders of clean energy initiatives in the country.

CESA works with state leaders, federal agencies, industry representatives, and other stakeholders to develop and promote clean energy technologies and markets. It supports effective state and local policies, programs, and innovation in the clean energy sector, with an emphasis on renewable energy, power generation, financing strategies, and economic development. CESA facilitates information sharing, provides technical assistance, coordinates multi-state collaborative projects, and communicates the views and achievements of its members.

Ørsted US Offshore Wind/Block Island Wind Farm



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Clockwise from upper left: Shutterstock/Soonthorn Wongsaita; Tom Piorkowski; Resonant Energy; Portland General Electric; RE-volv; Bigstockphoto.com/Davidm199