

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

Order Instituting Rulemaking on Customer-
Generated Renewables for Priority
Communities

Rulemaking 25-01-005
(Filed January 16, 2025)

**CLEAN COALITION COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING
SEEKING COMMENTS ON SENATE BILL 355 IMPLEMENTATION**

/s/ BEN SCHWARTZ

Ben Schwartz
Policy Manager
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573
ben@clean-coalition.org

July 18, 2025

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

Order Instituting Rulemaking on Customer-
Generated Renewables for Priority
Communities

Rulemaking 25-01-005
(Filed January 16, 2025)

**CLEAN COALITION COMMENTS ON ADMINISTRATIVE LAW JUDGE’S RULING
SEEKING COMMENTS ON SENATE BILL 355 IMPLEMENTATION**

I. INTRODUCTION

Pursuant to Rule 6.2 of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition respectfully submits these comments on *Administrative Law Judge’s (“ALJ”) Ruling Seeking Comments on Senate Bill (“SB”) 355 Implementation*, filed on June 20, 2025. We appreciate the opportunity to comment and that the Commission has chosen to focus on whether master metered properties should be eligible to participate in the Solar on Multi-family Affordable Housing (“SOMAH”) program. Most multi-family master metered properties are legacy buildings, many of which offer low-income and/or affordable housing. Modernizing these facilities requires a combination of energy efficiency, adding generation assets, and fuel switching (electrification). SOMAH provides a framework for the first two, and makes considering electrification palatable, especially in the context of correctly sizing a solar PV system. The Clean Coalition supports extending SOMAH eligibility to master metered properties and urges the Commission to make the inclusion swiftly.

II. DESCRIPTION OF PARTY

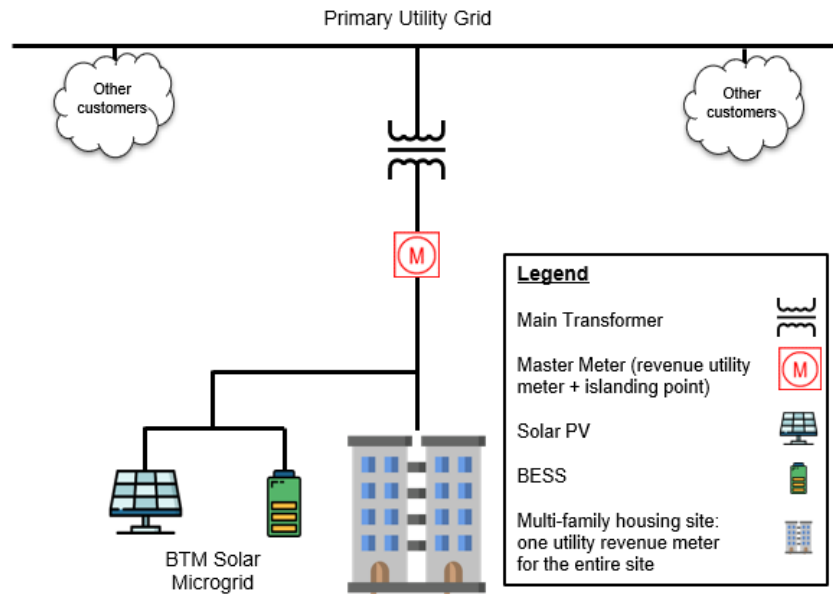
The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of DER—such as local renewables, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. COMMENTS

5. Given the pool of potential participating existing properties, is expanding the SOMAH program's eligibility to include master-metered affordable multifamily properties necessary to bring 300 megawatts of solar to California affordable multifamily housing properties by December 31, 2032? If so, why?

The Clean Coalition strongly supports expanding SOMAH eligibility to include master metered properties and believes it to be a necessary step in order to achieve the 300 MW capacity target. Assembly Bill 693, which created the SOMAH program, described the goal of the program as, “being to install a combined generating capacity **of at least 300 megawatts** on qualified properties.” (*emphasis added*) We urge the Commission to aim to deploy more than 300 MW by 2032 and take actions to increase the program's reach, especially if funds continue to remain unspent at the end of each year. Each of the utilities has over \$50 million in unspent SOMAH funds. With close to 100 MW in completed projects and active applications, the program will need to triple deployed capacity over the next seven years. Finding new opportunities to increase the pace of deployments will put the program on a sustainable path to achieve as desired. The number of facilities that serve low-income Californians and would stand to benefit from participation in SOMAH but are ineligible are substantial, especially when the need for resilience is considered.

Master metered properties represent untapped potential and offer an investment that synergistically meets multiple policy objectives. Master metered multi-family sites will benefit both from the added distributed generation and the energy efficiency measures. These legacy properties are often due for upgrades, making them prime candidates for electrification measures. Most were constructed pre-1996. Moreover, master metered properties are perfect candidates for paired solar PV and battery storage; the master meter can serve as a grid isolation point for the entire site, allowing a Solar Microgrid to effectively provide resilience to all critical loads.



Block diagram of a Solar Microgrid at a Master Metered Site

Low-income residents also deserve access to a program that can provide them with bill credits from a renewable energy system. They should not be denied the right to benefit from clean energy simply because the building where they have chosen to live is master metered versus the building across the street that is individually metered. Extending SOMAH eligibility to master metered properties is important to increase low-income participation. The Clean Coalition views including master metered properties in SOMAH as a prudent step needed to achieve and exceed the initial 300 MW target.

6. The SOMAH program requires participating properties to pass on bill benefits to tenants for, at least, the 20-year lifespan of the solar facility. In addition to meeting this requirement, what other participation challenges would master-metered properties face? How would such challenges be overcome? If proposing technology or software solutions, specify the types or provide examples to demonstrate that such proposals are actionable.

Sub-metered properties can likely allocate credits in a similar manner to the way credits are apportioned under VNEM and non-sub metered properties can include an equal credit for all units as a part of the rent.

7. If master-metered properties are allowed, how can the SOMAH Virtual Net Energy Metering (VNEM) tariff be adjusted to facilitate the program change?

No answer at this time.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these comments. We urge the

Commission to put SOMAH on pace to exceed the 300 MW goal by 2032 by determining master metered properties to be eligible.

/s/ BEN SCHWARTZ

Ben Schwartz

Policy Manager

Clean Coalition

1800 Garden Street

Santa Barbara, CA 93101

Phone: 626-232-7573

ben@clean-coalition.org

Dated: July 18, 2025