

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

Application of Pacific Gas And Electric
Company (U39E) for Review of the
Disadvantaged Communities – Green Tariff,
Community Solar Green Tariff and Green
Tariff Shared Renewables Programs.

And Related Matters

Application 22-05-022
(Filed December 2, 2022)

Application 22-05-023
Application 22-05-024

**CLEAN COALITION COMMENTS ON PROPOSED DECISION IMPLEMENTING
CALIFORNIA SHARED RENEWABLES PORTFOLIO**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) the Clean Coalition respectfully submits these comments in response to the *Proposed Decision* (“PD”) *Implementing California Shared Renewables Portfolio*, issued at the Commission on April 7, 2026.

The PD details the implementation process for the Community Renewable Energy Program (“CREP”), a community solar program designed to provide meaningful bill savings to participants, with an emphasis on subscribing low-income customers. Requirements for the CREP were laid out in D. 24-05-065, with eligibility and base compensation using the Renewable Market Adjusting Tariff (“ReMAT”). Fundamental to the Commission’s adoption of the CREP in D. 24-05-06 was the availability of additional federal and state sources of funding to supplement the base compensation.

The PD acknowledges that previously identified sources of non-ratepayer funds earmarked to supplement CREP compensation are no longer available yet fails to take the critical next step of assessing whether the proposed program remains viable absent these dollars. Public Utilities Code (“PUC”) §769.3(c) requires that the Commission, “Minimize impacts to nonparticipating customers by prohibiting the program’s costs from being paid by nonparticipating customers in excess of the avoided costs.” But minimizing nonparticipant impacts should not mean finalizing a program that lacks a financeable compensation structure and is unlikely to produce participant benefits.

That is the central flaw in the PD. The PD routes projects through ReMAT, preserves ReMAT-level compensation, and then layers on subscriber bill-credit and low-income participation requirements that reduce the developer’s net revenue and increase administrative complexity. Because ReMAT itself has attracted little recent participation, CREP is likely to be even less viable than the underlying tariff on which it depends.

The PD attempts to finalize the CREP under circumstances fundamentally different from those assumed in D.24-05-065, and even from those present when comments were last submitted in the proceeding in May 2025. The external funding sources that were expected to support project economics are not currently available, including the reversion of the \$33 million state appropriation and the termination of California’s Solar for All award. The PD itself acknowledges there are no available nonparticipating-customer funding sources.¹

In light of these extraordinary circumstances, it is neither prudent nor pragmatic to implement a program that relies on ReMAT-level compensation, imposes additional subscriber and bill-credit obligations, and provides no substitute mechanism to support financeable community solar projects.

If the Commission adopts the PD without additional compensation, funding, or a clear pathway to value avoided transmission, distribution, generation capacity, and resilience benefits, the CREP will exist only on paper and will not deliver community solar projects to the low-income customers it was created to serve.

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 distributed energy resources (“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,

¹ PD, at p. 7.

property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. COMMENTS

A. Changed Funding Conditions Require the Commission to Reassess the Viability of the CREP

In D. 24-05-065 the Commission selected a program tied to ReMAT, an existing and tested tariff, instead of the other proposals advanced in the proceeding. But the Decision was also quite transparent that the CREP may not provide sufficient compensation to generators. The Decision cites Southern California Edison’s proposal, which, “acknowledges that generator compensation under PURPA may not be sufficient to allocate a portion to fund a bill credit for subscribing customers,”² and identified three potential sources of incentives that could supplement the base ReMAT compensation.

However, the Commission adopted the CREP based on assumptions that are no longer true. Federal Solar for All funding has been terminated, the state funding reverted, federal tax-credit conditions have materially changed, and there are no other nonparticipating-customer funding sources available. Under these extraordinary circumstances, simply finalizing implementation details for the previously adopted framework is not prudent or pragmatic because the resulting program lacks the compensation needed to produce actual community solar deployments.

This concern is especially acute because ReMAT itself has attracted little recent project participation, meaning that CREP would add subscriber, bill-credit, and low-income participation obligations to a tariff that is already struggling to attract interest from developers.

The Commission should therefore not adopt a CREP framework that, based on the current record, lacks the compensation and funding necessary to attract projects. Doing so would not implement a community renewable energy program in any meaningful sense; it would only create a program that exists on paper while failing to deliver the community solar and storage deployments that the statute and D.24-05-065 were designed to advance.

Accordingly, the PD should be modified to recognize that the CREP cannot be implemented as a viable program under current funding conditions, and to defer final

² D. 24-05-065, at p. 114.

implementation unless and until the Commission identifies supplemental funding, adopts a financeable compensation framework, or establishes a pathway to compensate projects for avoided transmission, distribution, generation capacity, and resilience benefits.

IV. CONCLUSION

The Clean Coalition respectfully submits these comments and urges the Commission to amend the PD in order to avoid adopting a community solar program that is not designed for success in 2026.

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