

September 29, 2022

Advice No. 138-E
(Center for Sustainable Energy®)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Substantive and Minor Revisions to the Solar On Multifamily Affordable Housing (SOMAH) Program Handbook

PURPOSE

In accordance with California Public Utilities Commission (CPUC or Commission) Decision (D.)17-12-022,¹ the Center for Sustainable Energy® (CSE), on behalf of the Program Administrator (PA) Team for the SOMAH Program, respectfully submits this Advice Letter to propose necessary revisions to the SOMAH Program Handbook.

BACKGROUND

Assembly Bill (AB) 693 (Stats. 2015, Ch. 582) created the Multifamily Affordable Housing Solar Roofs Program, funded at up to \$100 million annually from the investor-owned utilities' (IOU) share of greenhouse gas (GHG) auction proceeds. Commission Decision D.17-12-022 implemented AB 693 and changed the name of the program to the Solar On Multifamily Affordable Housing (SOMAH) Program to distinguish it from other state clean energy and low-income solar programs. D.17-12-022 established the program's budget, incentive structure and eligibility policies, and, among other items, it determined that the SOMAH Program would be administered by a single statewide program administrator (PA) selected through a competitive request for proposal process.

D.17-12-022 additionally directed the SOMAH PA to submit a Tier 3 implementation Advice Letter that included a SOMAH Program Handbook for Commission consideration, subject to approval in a formal resolution. The SOMAH Program Handbook was approved via disposition of GRID Alternatives' Advice Letter 11 and its supplement, GRID Alternatives' Advice Letter 11-B, effective May 9, 2019.

¹ D.17-12-022, *Decision Adopting Implementation Framework for Assembly Bill 693 and Creating the Solar On Multifamily Affordable Housing Program*, December 14, 2017, page 56 and Appendix B, page 1: "Once the SOMAH Program Handbook is adopted, the [Program Administrator (PA)] may propose program adjustments to the Program Handbook via a Tier 2 Advice Letter."

On October 13, 2021, the SOMAH Phase II program evaluation report was released by Verdant Associates and Illume Advising. The Phase II program evaluation report “is focused on estimating program impacts (energy, environmental, and economic), finalizing program metrics and key performance indicators (KPIs), and collecting and analyzing data from SOMAH Program participants (solar contractors and property owners).”² The Phase II program evaluation report provided application streamlining recommendations aimed at reducing processing times and increasing program participation.

Pursuant to D.17-12-022, the SOMAH PA may propose program adjustments to the Program Handbook via a Tier 2 Advice Letter. Accordingly, CSE, on behalf of the SOMAH PA Team, hereby proposes necessary substantive and minor revisions to the SOMAH Program Handbook.

DISCUSSION

This Advice Letter proposes revisions to the SOMAH Program Handbook, with proposed revisions sorted into two categories: substantive and minor. Substantive revisions include a new SOMAH Program process or requirement. Minor revisions provide additional details and/or revisions to an existing SOMAH Program process or requirement, fix typographical errors, and/or streamline content.

The proposed revisions to the SOMAH Program Handbook are summarized below and also shown in redlined format in Attachment A.

Substantive Revisions

A. Application Streamlining: Reservation Request Milestone

This Handbook change will:

- Create an application workflow change to break the single milestone into two phases with the intent to reduce the initial administrative burden of submitting the Reservation Request Package.
- Streamline the requirements and process flow of application submission and SOMAH PA review at the Reservation Request Milestone.
- Provide a quicker timeline for IOU data request and data sharing.
- Remove the cover sheet document requirement.
- Remove the Application Deposit requirement: see proposed revision B.

Justification:

“Phase II of Third-Party Evaluation Recommended 15A” called for consideration of dividing the Reservation Request Package into more manageable steps and identifying opportunities to streamline program participation requirements. In response to the recommendations, the SOMAH PA identified the need to complete an in-depth review of the milestone before proposing specific changes to the Reservation Request to ensure

² *Solar on Multifamily Affordable Housing Phase II Report*, October 13, 2021, page 1.

there is adequate value in re-packaging the same requirements in a different way and to confirm if any requirements can be adjusted or removed. The SOMAH PA's response outlined that any potential modifications based on this recommendation would be included in the Q3 submittal of the Handbook 6.0 Advice Letter.

The Reservation Request Milestone is the entry point for Track B applications and has many components that result in a large, initial, administrative lift for the applicant. The goal of the proposed application streamlining is twofold: to lessen the burden of initial application submission; and to rearrange timelines within the Reservation Request Milestone to allow for an improved user experience and better integrated project timelines. The proposed phases were established based on stakeholder feedback to better match the project workflows with customer acquisition, project design, and engineering workflows of a solar project. These streamlining changes do not add any additional data entry or new requirements to the SOMAH application, but instead propose a shift or removal of reservation request requirements where possible.

The Reservation Request Milestone will shift from one large package to two smaller defined phases. Phase 1 will allow the basic required PowerClerk fields and document uploads to shrink by nearly half, only requiring the documentation to establish eligibility (cover sheet no longer required) and prepare for the IOU usage data request. Phase 2 will begin with communicating the returned IOU usage data and focusing on proper sizing or re-sizing the PV system based on the shared usage data. From there, the applicant is expected to adjust the system specifications in PowerClerk and submit the remaining required documentation, including the affidavit ensuring 100% tenant benefit, multiple bid waiver and final signoff of the Reservation Request Form. The SOMAH PA will perform a final round of data and documentation review to ensure the system is properly sized and all requirements are met before issuing the reservation approval.

Affected Handbook Section(s):

- 4.2.1 Submit Upfront Technical Assistance Request (Track A projects only)
- 4.2.2 Submit Reservation Request Package and Application Deposit (Application Deposit is applicable to systems > 10kW)
- 4.4 Application Forms and Documentation
- 4.4.1.3 Cover Sheet for Multifamily Low Income Housing Eligibility Documentation [Removed]
- Appendix H, Multifamily Low Income Housing Documentation Cover Sheet [Removed]

B. Removal of the Application Deposit Requirement

This Handbook change will:

- Remove the application deposit for all projects, not just priority groups.
- Return forfeited funds for application deposits of cancelled and withdrawn projects.

Justification:

To further the offering of application deposit waivers for priority groups included in SOMAH Handbook 5.0, this modification proposes to fully remove the application deposit requirement for all projects participating in the SOMAH program. Removing the application deposit for all projects will eliminate the initial financial barrier (\$1,250 - \$20,000) of participation in SOMAH and obtaining a reservation approval for all projects. The SOMAH PA proposes retaining the discretion to adjust or reinstate the application deposit requirement, if necessary, to ensure program funds for application processing are not unnecessarily expended on more speculative projects that do not come to fruition. With the application deposit fully waived for all projects, the SOMAH PA is confident that it will not only remove a financial barrier for participation but may also help to support customer acquisition across the entire program, not just priority groups. This proposed change will eliminate the deposit for all applications while retaining the SOMAH PA's ability to adjust or reinstate the application deposit requirement if deemed programmatically necessary.

With the removal of the application deposit requirement for all SOMAH projects, the SOMAH PA proposes to return the funds for forfeited deposits within 90 days of the disposition of this Advice Letter. The SOMAH PA believes that returning the forfeited funds is a fair gesture given the removal of the application deposit requirement and ensures that applicants receive consistent treatment as it relates to deposits. Additionally, with some of the forfeited application funds being paid by the property owner, the program does not wish to place an unfair financial burden on an affordable housing property owner for a requirement that is no longer in effect. There may also be a potential for project reentry for some of the cancelled projects with forfeited application deposits, and the SOMAH PA will conduct targeted outreach to these property owners and applicants to notify them of the refunded forfeited funds and determine their appetite to reengage with the SOMAH program. The total amount of forfeited projects to date equals \$161,250, covering 33 cancelled or withdrawn projects. Active projects that have already paid the application deposit will continue to receive their refund through the existing process, upon approval of the Incentive Claim Package.

Affected Handbook Section(s):

- 1.3.1.2 Standard Technical Assistance Services
- 3.1.1 EPBB Calculator Modifications
- 4.2 Application Process
- 4.2.2 Submit Reservation Request Package and Application Deposit (Application Deposit is applicable to systems > 10kW)
- 4.3 Waitlist Process
- 4.4 Application Forms and Documentation
- 4.4.2.5 Application Deposit
- 4.5.1 Application Withdrawal
- Appendix B, Definitions (Application Deposit)
- Appendix K, Invoice for Application Deposit [Removed]

C. Increased Time for Earmarked Funding with Track A Projects

This Handbook Change will:

- Increase the amount of time allowed for earmarked funding for Track A projects that have received Upfront Technical Assistance Approval.

Justification:

In reviewing the timelines of participating Track A projects, the SOMAH PA finds an adjustment to the time allowed for earmarked funding for Track A projects is essential for continuing an Upfront Technical Assistance offering that is supportive and realistic for Track A projects. Of the 39 Track A projects submitted, nine have received Upfront Technical Assistance, and four have moved forward with submitting the Reservation Request Package. Based on the timelines of these projects that have completed upfront technical assistance with submission of the Reservation Request Package, the SOMAH PA proposes to increase the time for earmarked funding for Track A projects from three months (90 days) to six months (180 days).

In reviewing the timelines of these projects and the experience of the SOMAH PA in providing the upfront technical assistance, it is evident that the intended three-month earmarked funding timeline is insufficient to provide the property owner with the resources needed to move forward with a SOMAH project and submit a Reservation Request Package. Every project that participates in Track A is different and has a unique set of needs. This often leads to personalized support that includes multiple solar potential and feasibility design iterations as well as financial models and cost/savings analyses. The SOMAH PA's personalized, supportive offering allows property owners an opportunity to understand the design options and financial structures that can work for them and their budget. By customizing solar feasibility and financial information the way the property owners need, they are better informed when communicating with contractors during the bidding process.

Track A is a service intended for property owners with less solar experience. As a result, there is a substantial learning curve and amount of effort dedicated by the property owner to fully understand the program and application process, navigate initial project scoping, and complete the bidding process to obtain a solar contractor. Furthermore, with the three-bid requirement for Track A projects, increasing the time for earmarked funding gives property owners the opportunity to complete a thorough bidding process, including the time needed for contractors to develop and submit comprehensive bids and to solicit additional bids from contractors if needed. Contractor bidding alone has constituted nearly two months of work, on average, for Track A projects to date.

The bidding process not only includes the time needed to receive bids from contractors, but time is needed for the decision-making process – to understand and digest the bid details, to communicate questions and receive answers from the bidding contractors, and for the property owner to have internal discussions and receive necessary

approvals to proceed. It is crucial for the property owner to have time during the bidding process to do their due diligence before submitting the Reservation Request Package. Therefore, increasing the overall time for Track A assistance will allow for a reasonable amount of time for both personalized customer support services in addition to the bidding and contractor selection process.

Affected Handbook Section(s):

- 4 Application Process for SOMAH Projects
- 4.2.1 Submit Upfront Technical Assistance Request (Track A projects only)
- 4.3 Waitlist Process

D. Adjusted Timeline for the Energy Efficiency Compliance Milestone

This Handbook change will:

- Increase the amount of time allowed from Reservation Approval to Energy Efficiency Compliance Milestone submission from 60 to 90 days.

Justification:

The goal for the Energy Efficiency Compliance Milestone (EECM) is to assess the project site for energy efficiency opportunities, focusing on reducing site consumption before producing solar energy at the property. In response to stakeholder feedback and observations from application processing, the SOMAH PA proposes to increase the amount of time allowed from Reservation Approval to EECM submission from 60 to 90 days to allow additional time to complete the EECM requirements without impacting the larger 18-month reservation period.

There are two pathways to fulfill the EECM requirement: Pathway 1 – energy efficiency whole-building walk-through audit; and Pathway 2 – recent or active participation in an approved whole-building energy upgrade program, documentation of a recent California Tax Credit Allocation Committee (TCAC) rehabilitation, or documentation that the property was completely constructed under a recent version of Title 24. Pathway 1, the whole-building walk-through audit, posed challenges to participants through the peak of the COVID-19 health crisis, which prompted the SOMAH PA to introduce a postponement option allowing projects to submit the EECM at either the Proof of Project Milestone or the Incentive Claim Milestone. The EECM postponement option was offered for over a year, ending September 13, 2021. EECM postponement was widely utilized by 337 projects during its offering, of which 53 projects have since been completed and paid.

Since ending the EECM postponement option, the SOMAH PA has received feedback from program participants experiencing challenges with completing the EECM requirements in the required 60 days and has observed some incomplete EECM application packages requiring redundant administrative efforts for suspension and

resubmittal. While the previous postponement option allowed for significantly more time than the standard 60-day requirement from Reservation Approval, the widespread use of the flexible offering further proves the benefit of considering adjustments to the EECM timeline. Participants have confirmed that a 30-day adjustment of the EECM required timeline, from 60 to 90 days, will provide the necessary relief to meet the program requirements in a consistent manner that better aligns with the timelines of the solar project development while also providing important feedback to the property owner regarding the energy efficiency baseline of their property in a timely manner. While this proposal does not change the application requirements, or impact the 18-month reservation period, the SOMAH PA believes this time adjustment is another valuable step in application streamlining to reduce the burden for program participants in addition to the application streamlining efforts proposed for the Reservation Request Milestone without undermining the intent of this requirement.

Affected Handbook Section(s):

- 1.2 SOMAH Program Handbook, Footnote 4
- 4.2.3 Submit Energy Efficiency Compliance Milestone

E. Option for Remote Site Inspections at Incentive Claim

This Handbook change will:

- Provide flexibility for the SOMAH PA to complete the final site inspection through a remote, desktop review inspection, instead of exclusively through onsite final inspections.

Justification:

In response to the current project pipeline and in anticipation of future SOMAH projects, the SOMAH PA proposes to include remote, desktop review, compliance inspections as an option in place of onsite field inspections in person. Current Handbook language requires that all SOMAH projects must undergo an onsite field inspection following submission of the Incentive Claim Package, while noting that the frequency and structure of inspections may be modified over the life of the SOMAH Program at the SOMAH PA's discretion. The proposed modification is intended to provide additional flexibility to meet the program requirement of a final onsite inspection while expediting incentive payments for participating property owners and contractors, further reducing the length of financial burden. In particular, the flexibility to provide remote inspections will be essential in supporting service to remotely located SOMAH projects, including projects on tribal lands. The remote inspection option will also provide operational efficiencies by reducing program labor and non-labor expenses for inspections, such as mileage (and related carbon emissions), resulting in savings of administrative funds for the program. Further, it will decrease the necessity for additional staffing and resources for inspections and prevent additional delays in timelines to project completion and incentive payment.

Conducting inspections virtually is an increasingly common industry standard that is already being offered, with similar proposals by Commission programs with related processes. Additionally, the proposed remote option for the final inspection will be based off the successful integration of what many participants are already familiar with through SOMAH's progress payment offering. Remote desktop review for final inspections will mirror SOMAH's existing virtual walkthrough process with a live video call, along with the applicant providing key photos of the SOMAH system that are normally captured by the SOMAH inspector during the onsite field inspection. Additional supporting documentation may be required from the SOMAH PA (i.e., shade readings, single line diagram) should it be necessary to ensure accurate verification beyond the live video call. The timeline benefits of the remote desktop inspection are sure to provide significant time savings as well. Comparing process timelines for the Progress Payment Pathway with the virtual walkthrough to onsite field inspections at Incentive Claim, the time savings with a remote inspection, similar to the virtual walkthrough, are estimated to have the potential of up to a 30-day savings from that of an onsite inspection.

The SOMAH PA will offer the remote inspection option upon submission of the Incentive Claim Package instead of a notification to schedule the onsite inspection. This offering will be determined by assessing the project location in reference to the location of SOMAH inspectors and will consider the complexity of the system as well. The remote inspection option will initially be a case-by-case offering at the discretion of the SOMAH PA to ensure timely and effective use of the flexible offering. By default, participating projects should expect a final onsite inspection unless otherwise notified by the SOMAH PA. If approved, the SOMAH PA will evaluate the use and benefit of the remote final inspection and may propose an expanded offering with default requirements for projects to qualify for the remote inspection offering. This evaluation period will commence with disposition of this Advice Letter carrying through a six-month period, with subsequent reporting in a Semiannual Progress Report for transparency and stakeholder information.

Affected Handbook Section(s):

- 2.3.5 Inspection Requirements
- 2.3.6 Interconnection, Performance and Permanency Requirements
- 3.3 Incentive Limitations
- 4.6.2 Final Incentive Payment
- 4.8 Onsite Field Inspections
- 4.8.1 Key Project Components Reviewed During Onsite Field Inspections
- 4.8.2 Acceptable Range of Parameters for Key Project Components Reviewed During Inspection
- 4.8.3 Process to Contest Field Inspection Results
- 4.9 PA Recourse for Program Requirement Non-compliance

- 4.9.1 Issuance of Infractions
- 4.9.2 Issuance of Failures
- 4.9.5 Grounds for Immediate Disqualification from the SOMAH Program
- Appendix B, Definitions (Final Inspection)

Minor Revisions

A. CCA VNEM Tariff Clarification

This Handbook change will:

- Clarify that CCA customers for SOMAH projects will utilize the relevant participating IOU's VNEM tariff because CCAs do not have their own, separate SOMAH VNEM tariff.

Affected Handbook Section(s):

- 2.1 Program Participants
- 2.2.1 Eligible Multifamily Low-Income Housing Properties
- 4.4.2.2 Proof of Electric Utility Service for Site

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, and D.17-12-022, this Advice Letter is submitted with a Tier 2 designation.

PROTESTS

Anyone wishing to protest this Advice Letter may do so by letter sent electronically, which must be received no later than October 19, 2022, which is twenty (20) calendar days after the submittal of this Advice Letter. Protests should be emailed to:

CPUC Energy Division
Attention: Tariff Unit
Email: EDTariffUnit@cpuc.ca.gov

Copies of the protest should also be emailed to the CPUC's Energy Division Director.

In addition, protests and all other correspondence regarding this Advice Letter should also be sent electronically to CSE on the same date it is emailed to the Commission to the attention of:

Sephra Ninow
Director, Regulatory Affairs
Center for Sustainable Energy®
E-mail: sephra.ninow@energycenter.org

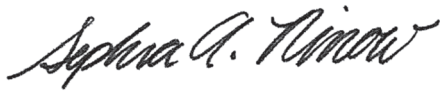
There are no restrictions as to who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

EFFECTIVE DATE

CSE requests that this Advice Letter become effective on regular notice, October 29, 2022, which is thirty (30) calendar days after the date of submittal.

NOTICE

CSE is providing a copy of this Advice Letter to service list R.14-07-002, A.16-07-015 (consolidated).



Sephra A. Ninow, J.D.
Director, Regulatory Affairs
Center for Sustainable Energy®

cc: Service List R.14-07-002, A.16-07-015 (consolidated)

Attachment: Attachment A –Proposed Revised SOMAH Program Handbook (redlined)



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Center for Sustainable Energy® (CSE)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Sephra Ninow

Phone #: (858) 244-1186

E-mail: sephra.ninow@energycenter.org

E-mail Disposition Notice to: sephra.ninow@energycenter.org

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

September 29, 2022

Advice Letter (AL) #: 138-E

Tier Designation: 2

Subject of AL: Proposed Substantive and Minor Revisions to the Solar On Multifamily Affordable Housing (SOMAH) Program Handbook

Keywords (choose from CPUC listing): Rebates; Solar

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.17-12-022

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: N/A

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? Yes No

Requested effective date: 10/29/22

No. of tariff sheets: 0

Estimated system annual revenue effect (%): 0

Estimated system average rate effect (%): 0

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: Proposed Substantive and Minor Revisions to the Solar On Multifamily Aff

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Sephra Ninow
Title: Director, Regulatory Affairs
Utility Name: Center for Sustainable Energy®
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ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Notice of Availability

On behalf of the Program Administrator (PA) Team for the Solar On Multifamily Affordable Housing (SOMAH) Program, Center for Sustainable Energy® (CSE) hereby provides notice that due to the size of Attachment A, an electronic copy of the redlined Proposed Revised SOMAH Program Handbook illustrating the proposed substantive and minor revisions to the SOMAH Program Handbook may be viewed at:

<http://www.calsomah.org/redlines8>

If you have any problems accessing this document, please contact Ben Airth via e-mail at benjamin.airth@energycenter.org.

Thank you!

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code
Section 2827.1, and to Address Other
Issues Related to Net Energy Metering.

RULEMAKING 14-07-002
(Filed July 10, 2014)

And Related Matter.

Application 16-07-015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this *CSE Advice Letter 138-E*, on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.14-07-002, A.16-07-015 (consolidated).

Executed on September 29, 2022, in San Diego, CA.



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California
Public Utilities
Commission



CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1407002 - CPUC - OIR TO DEVELO
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: SEPTEMBER 22, 2022

[Download the Comma-delimited File](#)
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