

# AB 2143 Updates and Informational Webinar

## March 31, 2026

### Q&A Document

The Solar-Utilities Reporting, Guidance, and Education (SURGE) initiative directed by the California Public Utilities Commission (CPUC) has prepared the following document with the questions and answers from the AB 2143 Updates and Informational Webinar on 3/31/26.

#### Webinar Resources:

- [Presentation Slides](#)
- [Webinar Recording](#)

#### Upcoming Events:

- [SURGE AB 2143 Events & Webinars](#)
- [Department of Industrial Relations \(DIR\) 2026 Public Works Trainings](#)

#### Important SURGE Reminder:

#### **JULY 1<sup>ST</sup> DEADLINE TO SUBMIT COPIES OF CERTIFIED PAYROLL RECORDS:**

Contractors with projects subject to AB 2143 and PUC 769.2 must upload copies of Certified Payroll Records for the period of December 1, 2025, to May 31, 2026 to the SURGE Compliance Portal by July 1, 2026, at 5:00 PM (PST/PDT). Failure to meet this deadline may result in interconnection application processing delays.

#### SURGE Compliance Portal:

Contractors must register and submit copies of certified payroll records to CPUC SURGE via the [SURGE Compliance Portal](#).

#### Have Questions?

For additional information and resources, please visit the CPUC SURGE website at [www.cpucsurge.org](http://www.cpucsurge.org). If you require additional support, please send an email to [info@cpucsurge.org](mailto:info@cpucsurge.org).

#### Contact Us

[www.cpucSURGE.org](http://www.cpucSURGE.org)

[info@cpucSURGE.org](mailto:info@cpucSURGE.org)

1-800-549-2143

## Contents

<b>Question Categories</b> .....	3
<b>Awarding Body</b> .....	3
<b>Project Exemptions</b> .....	3
<b>System Size Determination</b> .....	4
<b>Interconnection</b> .....	4
<b>Non-Performing Weeks for Certified Payroll Reporting</b> .....	5
<b>Certified Payrolls Report</b> .....	5
<b>Project Registration</b> .....	6
<b>SURGE Compliance</b> .....	6

### Contact Us

[www.cpucSURGE.org](http://www.cpucSURGE.org)

[info@cpucSURGE.org](mailto:info@cpucSURGE.org)

1-800-549-2143

## Question Categories

### Awarding Body

**Q: Is the DIR applying the Awarding Body guidance (AB 1104) to federal and state projects, or will those registrations still be done by the project owner?**

**A:** AB 1104 only applies to project covered by AB 2143. It does not affect public works projects that are not subject to AB2143.

### Project Exemptions

**Q: We have a project starting in a few months on tribal land and the project is privately funded. Does prevailing wage rates apply?**

**A:** Exemption from AB 2143 requirements is available for projects located on tribal land, however, exemptions must be processed through SURGE. Properties located on sovereign tribal land may qualify for an exemption if proper documentation (verifiable evidence) is provided. Please email verifiable evidence to the SURGE Team for review by emailing [info@cpucsurge.org](mailto:info@cpucsurge.org). Any exemption not specifically outlined in AB 2143 will be evaluated on a case-by-case basis.

**Q: Does AB 2143 prevailing wage apply to solar installation under 15 kilowatts on a church?**

**A:** For prevailing wage exemptions, you will need to review AB 2143 to determine if the project qualifies. Residential solar projects under 15 kilowatts and single-family homes are exempt, however, this exemption does not extend to commercial projects such as churches.

**Q: Is a clubhouse for an apartment complex exempt from AB 2143?**

**A:** A project is exempt from AB 2143 if it falls under the following eligibility exceptions:

- Residential facilities with a maximum generating capacity of 15 kilowatts or less or installed on a single-family home.
- Projects already classified as a public work under existing law (separate from AB2143)
- Facilities serving only a modular home, a modular home community, or multiunit housing with 2 or fewer stories.

If it does not meet one of these exemptions and is interconnected under an applicable tariff, then AB 2143 applies.

**Q: How do we calculate the 15-kW maximum where the project is exempt?**

**A:** The 15-kW exemption applies to residential facilities based on the project's maximum generating capacity. Residential facilities mean any place where people live, such as apartment buildings, adult care facilities, foster care, and other residential housing types. If the system's total generating capacity is 15 kilowatts or less, the project is exempt from AB 2143. Additional questions regarding calculating capacity for systems should be directed to the Utility, as CPUC will defer to the utilities' methodologies on this.

### System Size Determination

**Q: How are the system sizes determined under AB 2143? Do we use CEC-AC size, AC Inverter system size, or DC system size (DC-STC)?**

**A:** Calculating capacity for systems should be directed to the Utility, as CPUC will defer to the utilities' methodologies on this.

### Interconnection

**Q: What happens when an interconnection application is locked in 'engineering' for multiple months, inhibiting the project from being active on Surge and preventing the CPRs from being uploaded?**

**A:** If an interconnection application is delayed in engineering and prevents SURGE registration or Certified Payroll Report uploads, the issue will be reviewed on a case-by-case basis. Contractors should contact the SURGE team with documentation explaining the delay to avoid portal holds or penalties. Even if a project cannot yet be registered in SURGE, the project must be registered with the DIR, certified payroll must be submitted to the DIR, and payroll records must be maintained while work is ongoing.

**Q: We are an Engineering, Procurement and Construction (EPC) and my contract is with a GC. We submit the interconnection application. Who is considered the Prime from SURGE's perspective?**

**A:** From SURGE's perspective, whoever holds the contract with the project owner would be considered the Prime Contractor. If your contract is with the General Contractor, then you would be the Subcontractor. Additionally, if Subcontractors submit the interconnection

#### Contact Us

[www.cpucSURGE.org](http://www.cpucSURGE.org)

[info@cpucSURGE.org](mailto:info@cpucSURGE.org)

1-800-549-2143

application instead, their CSLB number will be flagged in the event of non-compliance, even if they are not the Prime Contractor. We strongly recommend that the Prime Contractor complete and submit the interconnection applications.

### **Non-Performing Weeks for Certified Payroll Reporting**

**Q: When the Prime is not performing any work on the project, will the subcontractor be the only one submitting copies of certified payroll?**

**A:** Yes. If the Prime Contractor does not perform onsite labor on the project, they will not report any Certified Payrolls. However, they are still required to register themselves and the project on the SURGE and DIR portals. In the SURGE portal, the Prime Contractor must indicate if they are self-performing. Selecting “self-performing” on the project registration form means the Contractor uses their own labor crews, while selecting “not self-performing” indicates the work is subcontracted and requires listing all Subcontractors performing labor on the project.

**Q: For non-performing weeks, is it sufficient to submit a CPR that clearly states no work performed?**

**A:** Yes, if it contains the Statement of Compliance (or declaration under penalty of perjury) that no work was performed. A Statement of Non-Performance is required after the first performing week onsite and until the contractor or subcontractor submits their final payroll. Without non-performance payrolls, agencies such as DIR and auditors cannot determine if work was performed, making it appear as though payrolls are missing.

### **Certified Payrolls Report**

**Q: What do you do with the CPRs that are submitted? What are you reviewing?**

**A:** The SURGE Team’s role is to review certified payroll reports for completeness, not to verify wage rates or correct prevailing wage pay. The DIR is responsible for confirming the correct wage classification and pay rates.

SURGE checks all required fields are completed under the California Labor Code, approves payroll forms, verifies that a signed statement of compliance is included, and that any required statement of non-performances are submitted. SURGE also reviews job classifications to ensure they are DIR recognized.

**Q: What happens if a Certified Payroll Report is marked as Final but months later, the contractor is called back out at the end of the project and a new Certified Payroll Report are required? How can we notify SURGE?**

A: Contractors can send a message to SURGE informing us that additional submissions are required. You would then edit your latest submission and uncheck the box indicating the final submission. After that, Statements of Non-Performance should be submitted to cover the weeks that no work was performed.

### Project Registration

**Q: How long should we expect to take a project getting registered with SURGE?**

A: The SURGE team processes the submissions in the order we receive them. Project registration is processed as quickly as possible, and timelines may vary based on documents' completeness. If you have not heard back from SURGE on your request, please send us a follow-up email at [info@cpucsurge.org](mailto:info@cpucsurge.org).

**Q: What steps can a sub-contractor take when a project is complete, but the Prime Contractor has not registered with SURGE and Prime contractors are being unresponsive?**

A: The SURGE Team needs to understand why the Prime contractor is unresponsive. The Prime Contractor is responsible for compliance with AB 2143 requirements for their projects. If you continue to experience issues with the prime contractor, please email us at [info@cpucsurge.org](mailto:info@cpucsurge.org).

### SURGE Compliance

**Q: If we submit a question to [info@cpucsurge.org](mailto:info@cpucsurge.org), what is the typical response time?**

A: A typical response time for questions should be between 3-5 business days, but if you haven't received a response from the SURGE Team, please send us a follow-up email at [info@cpucsurge.org](mailto:info@cpucsurge.org).

**Q: Do you want us to reply to deficiencies using [info@cpucsurge.org](mailto:info@cpucsurge.org) email inbox or the messages in Submittable?**

A: Contractors should use the Submittable message system to respond to questions or issues.

#### Contact Us

[www.cpucSURGE.org](http://www.cpucSURGE.org)

[info@cpucSURGE.org](mailto:info@cpucSURGE.org)

1-800-549-2143

**Q: Will there be another webinar focused on the DIR process?**

**A:** The California Department of Industrial Relations (DIR) has released their educational seminar training schedule. The next training will be on April 23, 2026. Please see upcoming DIR trainings here: [Support Center](#)

**Q: Where can we find a recording of this seminar that includes all the PowerPoint slides?**

**A:** The webinar recording and PDF slides are available on the SURGE website. The links are attached for your reference:

- [SURGE-PPT-03.31.26-1.pdf](#)
- [SURGE AB 2143 Updates and Informational Webinar 3.31.26](#)